CODES AND STANDARDS ENHANCEMENT INITIATIVE (CASE)

Draft Report – Residential Ducts in Conditioned Space / High Performance Attics

Measure Number: 2016-RES-ENV1-D

Residential Envelope

2016 CALIFORNIA BUILDING ENERGY EFFICIENCY STANDARDS

California Utilities Statewide Codes and Standards Team

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EXECUTIVE SUMMARY

Introduction

The Codes and Standards Enhancement (CASE) initiative presents recommendations to support California Energy Commission's (CEC) efforts to update California's Building Energy Efficiency Standards (Title 24) to include new requirements or to upgrade existing requirements for various technologies. The four California Investor Owned Utilities (IOUs) – Pacific Gas and Electric Company, San Diego Gas and Electric, Southern California Edison and Southern California Gas Company – and Los Angeles Department of Water and Power (LADWP) sponsored this effort. The program goal is to prepare and submit proposals that will result in cost-effective enhancements to energy efficiency in buildings. This report and the code change proposal presented herein is a part of the effort to develop technical and cost-effectiveness information for proposed regulations on building energy efficient design practices and technologies.

The overall goal of this CASE Report is to propose a code change proposal for measure name. The report contains pertinent information that justifies the code change including:

- Description of the code change proposal, the measure history, and existing standards (Section 2);
- Market analysis, including a description of the market structure for specific technologies, market availability, and how the proposed standard will impact building owners and occupants, builders, and equipment manufacturers, distributers, and sellers (Section 3);
- Methodology and assumption used in the analyses energy and electricity demand impacts, cost-effectiveness, and environmental impacts (Section 4);
- Results of energy and electricity demand impacts analysis, Cost-effectiveness Analysis, and environmental impacts analysis (Section 5); and
- Proposed code change language (Section 6).

This is a draft version of the CASE Report. The 2016 Time Dependent Valuation (TDV) values were not yet available when this draft report was being developed. The TDV energy and cost savings presented in this draft report were developed using 2013 TDV values. The TDV energy and cost savings presented in this draft report were developed using 2013 TDV values and TDV cost saving are in 2011 dollars. The Statewide Statewide CASE Team will be submitting a revised version of this report in fall 2014, which will include the final recommended code change proposal and a updated TDV energy and cost savings results that use the 2016 TDV values.

Scope of Code Change Proposal

Residential Ducts in Conditioned Space / High Performance Attics will affect the following code documents listed in Table 1.

Table 1: Scope of Code Change Proposal

Standards Requirements (see note below)	Compliance Option	Appendix	Modeling Algorithms	Simulation Engine	Forms
M, Ps	Yes	RA2, RA3, RA4	Yes	Yes	Various

Note: An (M) indicates mandatory requirements, (Ps) Prescriptive, (Pm) Performance.

List of other areas affected including changes to trade-offs:

- Residential Compliance Manual
- Residential Alternative Compliance Method Manual

Measure Description

The Residential Ducts in Conditioned Space / High Performance Attics measure consists of two alternatives, as stated in the measure name, to improve building thermal envelope and reduced HVAC distribution losses in residential buildings. These two approaches will have similar energy impacts on the building. Ducts in Conditioned Space (DCS) will require that ducts and equipment be located within the thermal and air boundary of the building. High Performance Attics (HPA) is a package of measures that minimizes the temperature difference between the attic and the conditioned air in ducts. The compliance options will be modified to promote ductless systems¹. This measure will affect the prescriptive and mandatory sections of code for low-rise residential buildings.

For the 2013 Title 24 Building Energy Efficiency Standards, a CASE Report² proposed a set of measures similar to the High Performance Attic proposal, which also included cool roof requirements. However, the total cost for the package of measures – proposed as a vented attic package – was deemed to be cost prohibitive based on industry feedback despite being life cycle cost effective. Additionally, the team investigated an unvented attic package for ducts in conditioned space as a compliance option. Although the entire proposal was not adopted, improvements were made to modeling capabilities for derating insulation at the attic eaves. Cool roofs and radiant barriers were adopted into the 2013 Standards for some climate zones.

¹ The CEC is currently engaging manufacturers of ductless systems to ensure that the CBECC-Res software calculates energy performance of these systems appropriately. As of the writing of this report, the software does not model ductless systems with listed efficiency features. Instead the software considers ductless systems to have the same efficiency as the baseline Split DX system. This is due to CEC concerns about the lack of installation criteria and HERS verification protocols.

²www.energy.ca.gov/title24/2013standards/prerulemaking/documents/current/Reports/Residential/Envelope/2013_CASE_R_Roo_f_Measures_Oct_2011.pdf

Section 2 of this report provides detailed information about the code change proposal including: *Section 2.2 Summary of Changes to Code Documents (page 8)* provides a section-by-section description of the proposed changes to the standards, appendices, alternative compliance manual and other documents that will be modified by the proposed code change. See the following tables for an inventory of sections of each document that will be modified:

- Table 7: Scope of Code Change Proposal (page 8)
- Table 8: Sections of Standards Impacted by Proposed Code Change (page 9)
- Table 9: Appendices Impacted by Proposed Code Change (page 10)
- Table 10: Sections of ACM Impacted by Proposed Code Change (page 11)

Detailed proposed changes to the text of the building efficiency standards, the reference appendices, and are given in Section 6 of this report. This section proposes modifications to language with additions identified with <u>underlined</u> text and deletions identified with <u>struck out</u> text.

Market Analysis and Regulatory Impact Assessment

DCS and HPA strategies are not widely implemented in the California residential market which is dominated by ducts on top of the ceiling insulation in cold and/or hot attics. But the numbers are increasing in the high performance homes market due to tighter energy budgets and greater difficulty in achieving the "above code targets" for incentive programs. DCS and HPA will both have adjustments to attic insulation placement and possibly insulation type. There are different options and combinations of insulation that can be used which are widely available from retailers and distributors. Additionally, the DCS strategy will require a sealed furnace, which is available from multiple manufacturers and some of these sealed furnaces meet current federal minimum efficiency requirements.

If installed properly and according to best design guidelines, these measures will be low maintenance and persist for the life of the measure.

This proposal is cost effective over the period of analysis. Overall this proposal increases the wealth of the State of California. California consumers and businesses save more money on energy than they do for financing the efficiency measure. As a result this leaves more money available for discretionary and investment purposes.

The expected impacts of the proposed code change on various stakeholders are summarized below:

• Impact on builders: The DCS strategy will require modifications to building designs and practices that will impact builders and trades. The HPA measure will have minor impact on building practices, with the exception of installing roof deck insulation. HVAC contractors will need to be part of the design team and provide duct system layout and sizing for inclusion in the plans. Site building superintendents will need to modify scheduling to allow access of subcontractors in the sequence needed to perform the work.

- Impact on building designers: The DCS strategy will require that designers integrate the HVAC system and layout with the rest of the plans as part of the design process. From the beginning of the design process, designers will need to determine the strategy to be used and what spaces are needed to accommodate the strategy.
- Impact on occupational safety and health: The proposed code change is not expected to have an impact on occupational safety and health.
- Impact on building owners and occupants: Since this measure is cost-effective, the building owner or occupant who pays the energy bills will experience net cost savings over their additional mortgage or rent costs.
- Impact on equipment retailers (including manufacturers and distributors): The DCS and HPA strategies may increase demand for certain building products, such as various options for roof deck insulation. The DCS strategy will also have impacts on certified low-leakage air handlers and sealed combustion furnaces.
- **Impact on energy consultants:** This measure is not expected to have any significant impacts on energy consultants.
- **Impact on building inspectors:** No new inspections will be introduced, and, as compared to the overall code enforcement effort, this measure has negligible impact on the effort required to enforce the building codes.
- Statewide Employment Impacts: The proposed measures will increase the demand for trades with specific skill, knowledge and experience working with these strategies and products.
- Impacts on the creation or elimination of businesses in California: The updates to Title 24 as a whole are expected to drive additional business creation in California. This is discussed in greater detail below in Section 3.5.2. This measure is not expected to have an appreciable impact on any paritcualr business in California.
- Impacts on the potential advantages or disadvantages to California businesses:

 California businesses would benefit from an overall reduction in energy costs. This could help California businesses gain competitive advantage over businesses operating in other states or countries and an increase in investment in California. This measure is not expected to have an appreciable impact on any paritcualr business in California.
- Impacts on the potential increase or decrease of investments in California: As described in Section 3.5 of this report, the California Air Resources Board (CARB) economic analysis of greenhouse gas reduction strategies for the State of California indicates that higher levels of energy efficiency and 33% Renewable Portfolio Standard (RPS) will increase investment in California by about 3% in 2020 compared to 20% RPS and lower levels of energy efficiency. After reviewing the CARB analysis, the Statewide Statewide CASE Team concluded that the majority of the increased investment of the more aggressive strategy is attributed to the benefits of efficiency (CARB 2010b Figures 7a and 10a). The specific code change proposal presented in this report is not expected to have an appreciable impact on investments in California.

- Impacts on incentives for innovations in products, materials or processes: Updating Title 24 standards will encourage innovation through the adoption of new technologies to better manage energy usage and achieve energy savings. There are no projected impediments to, or incentives for, innovation that would result from the proposed measures.
- Impacts on the State General Fund, Special Funds and local government: The proposed measure is not expected to have an appreciable impact on the State General Fund, Special Funds, or local government funds.
- Cost of enforcement to State Government and local governments: Building inspection requirements remain the same. Likewise, training or additional time spent on enforcement, which may lead to increased enforcement costs for the state or local government, are minimal.
 - State government already has budgeted for code development, education, and compliance enforcement. While state government will be allocating resources to update the Title 24 standards, including updating education and compliance materials and responding to questions about the revised standards, these activities are already covered by existing state budgets. The costs to state government are small when compared to the overall costs savings and policy benefits associated with the code change proposals.
 - The building code is updated on a triennial basis, and local governments plan and budget for retraining every time the code is updated. There are numerous resources available to local governments to support compliance training that can help mitigate the cost of retraining. Although retraining is a cost of the revised standards, Title 24 energy efficiency standards are expected to increase economic growth and income with positive impacts on local revenue.
- Impacts on migrant workers; persons by age group, race, or religion: This proposal and all measures adopted by CEC into Title 24, part 6 do not advantage or discriminate in regards to race, religion or age group.
- Impact on Homeowners (including potential first time home owners): This proposal is cost-effective for the homeowner. As a result the combined mortgage costs and utility bill payment for the homeowner are less if the measure is incorporated into all new homes.
- Impact on Renters: This proposal is advantageous to renters as it reduces the cost of utilities which are typically paid by renters. Since the measure saves more energy cost on a monthly basis than the measure costs on the mortgage as experiences by the landlord, the pass-through of added mortgage costs into rents is less than the energy cost savings experienced by renters.
- **Impact on Commuters:** This proposal and all measures adopted by CEC into Title 24, part 6 are not expected to have an impact on commuters

Statewide Energy Impacts

Table 2 shows the estimated energy savings over the first twelve months of implementation of the Residential Ducts in Conditioned Space and High Performance Attics.

Table 2: Estimated First Year Energy Savings

	First Y	First Year Statewide Savings			
	Electricity Savings (GWh)	Power Demand Reduction (MW)	Natural Gas Savings (MMtherms)	TDV Electricity and Gas Savings (Million kBTU)	
HPA – R-13 below roof deck	17.6	TBD	1.26	1,240	
DCS – Verified low leakage ducts in conditioned space	21.6	TBD	2.85	1,756	

Section 4.6.1 discusses the methodology and Section 5.1.1 shows the results for the per unit energy impact analysis.

Cost-effectiveness

Results per unit Cost-effectiveness Analyses are presented in Table 3. The TDV Energy Costs Savings are the present valued energy cost savings over the 30 year period of analysis using CEC's TDV methodology. The Total Incremental Cost represents the incremental initial construction and maintenance costs of the proposed measure relative to existing conditions (current minimally compliant construction practice when there are existing Title 24 Standards). Costs incurred in the future (such as periodic maintenance costs or replacement costs) are discounted by a 3 percent real discount rate, per CEC's LCC Methodology. The Benefit to Cost (B/C) Ratio is the incremental TDV Energy Costs Savings divided by the Total Incremental Costs. When the B/C ratio is greater than 1.0, the added cost of the measure is more than offset by the discounted energy cost savings and the measure is deemed to be cost effective. For a detailed description of the Cost-effectiveness Methodology see Section 4.7 of this report.

The Change in Lifecycle Cost values are negative in climate zones 1,2,4, and 8-16; the proposed DCS and HPA measure packages are cost-effective in these climate zones with proposed changes. The Statewide CASE Team has formulated the code change proposal for climate zones and requirement levels that are shown to have satisfactory cost-effectiveness results. The Statewide CASE Team proposed for the requirements to apply to climate zones 1-2, 4, and 8 through 16.

Table 3: Cost-effectiveness Summary

Climate Zone	Benefit: TDV Energy Cost Savings (2013 PV\$)	Cost: Total Incremental Cost (2013 PV\$)	Change in Lifecycle Cost (2013 PV\$)	Benefit to Cost (B/C) Ratio
Climate Zone 1	\$ 1,129	\$ 589	\$ (540)	1.9
Climate Zone 2	\$ 1,011	\$ 831	\$ (180)	1.2
Climate Zone 3	\$ 478	\$ 831	\$ 353	0.6
Climate Zone 4	\$ 1,063	\$ 831	\$ (232)	1.3
Climate Zone 5	\$ 421	\$ 831	\$ 410	0.5
Climate Zone 6	\$ 518	\$ 831	\$ 314	0.6
Climate Zone 7	\$ 198	\$ 831	\$ 633	0.2
Climate Zone 8	\$ 1,295	\$ 831	\$ (464)	1.6
Climate Zone 9	\$ 2,174	\$ 831	\$ (1,343)	2.6
Climate Zone 10	\$ 2,023	\$ 831	\$ (1,192)	2.4
Climate Zone 11	\$ 2,956	\$ 589	\$ (2,367)	5.0
Climate Zone 12	\$ 2,290	\$ 589	\$ (1,701)	3.9
Climate Zone 13	\$ 3,503	\$ 589	\$ (2,914)	5.9
Climate Zone 14	\$ 2,497	\$ 670	\$ (1,828)	3.7
Climate Zone 15	\$ 4,600	\$ 589	\$ (4,011)	7.8
Climate Zone 16	\$ 2,270	\$ 670	\$ (1,601)	3.4

These values are based on installing R-13 insulation below the roof deck and R-38 above the ceiling. Section 4.7 discusses the methodology and section 5.2 shows the results of the Cost Effectiveness Analysis

Greenhouse Gas and Water Related Impacts

For more a detailed and extensive analysis of the possible environmental impacts from the implementation of the proposed measures, please refer to Section 5.3 of this report.

Greenhouse Gas Impacts

Table 4 presents the estimated avoided greenhouse gas (GHG) emissions of the proposed code change for the first year the standards are in effect. Assumptions used in developing the GHG savings are provided in Section 4.8.1.

The monetary value of avoided GHG emissions is included in TDV cost factors (TDV \$) and is thus included in the Cost-effectiveness Analysis prepared for this report.

Table 4: Estimated Statewide Greenhouse Gas Emissions Impacts

	First Ye	ear Statewide
	Avoided GHG Emissions (MTCO ₂ e/yr)	Monetary Value of Avoided GHG Emissions (\$2017)
HPA – R-13 below roof deck	12,900	TBD
DCS – Verified low leakage ducts in conditioned space	22,760	TBD

Values in Table 4 are for each of the options to meet the proposed code requirements and represent the savings in climate zones 1, 2, 4, 8-16. Each row represents one option to meet he proposed code requirements and as such the two rows should not be added for statewide savings. Section 4.8.1 discusses the methodology and Section 5.3.1 shows the results of the greenhouse gas emission impacts analysis.

Water Use and Water Quality Impacts

The proposed measure is not expected to have any impacts on water use or water quality, excluding impacts that occur at power plants.

Field Verification and Diagnostic Testing

The DCS and HPA proposals will require field verification for some measures, some of which are already in the current standards. The existing field verification and diagnostic tests include:

- Duct leakage test
- House pressurization test
- Quality Insulation Installation (QII)
- Verification of ducts in conditioned space, low leakage air handlers and reduced duct surface area
- Duct leakage to outside test for DCS options

The new field verification and diagnostic tests needed or to be modified include:

- Verification of proper roof deck insulation installation
- Verification of air handler location for vented attic DCS options
- Leakage to the outside in the case of a Unvented Attic

1. Introduction

The Codes and Standards Enhancement (CASE) initiative presents recommendations to support California Energy Commission's (CEC) efforts to update California's Building Energy Efficiency Standards (Title 24) to include new requirements or to upgrade existing requirements for various technologies. The four California Investor Owned Utilities (IOUs) – Pacific Gas and Electric Company, San Diego Gas and Electric, Southern California Edison and Southern California Gas Company – and Los Angeles Department of Water and Power (LADWP) sponsored this effort. The program goal is to prepare and submit proposals that will result in cost-effective enhancements to energy efficiency in buildings. This report and the code change proposal presented herein is a part of the effort to develop technical and cost-effectiveness information for proposed regulations on building energy efficient design practices and technologies.

The overall goal of this CASE Report is to propose a code change proposal for Residential Ducts in Conditioned Spaces/High Performance Attics. The report contains pertinent information that justifies the code change.

Section 2 of this CASE Report provides a description of the measure, how the measure came about, and how the measure helps achieve the state's zero net energy (ZNE) goals. This section presents how the Statewide Statewide CASE Team envisions the proposed code change would be enforced and the expected compliance rates. This section also summarized key issues that the Statewide Statewide CASE Team addressed during the CASE development process, including issues discussed during a public stakeholder meeting that the Statewide Statewide CASE Team hosted in May 2014.

Section 3 presents the market analysis, including a review of the current market structure, a discussion of product availability, and the useful life and persistence of the proposed measure. This section offers an overview of how the proposed standard will impact various stakeholders including builders, building designers, building occupants, equipment retailers (including manufacturers and distributors), energy consultants, and building inspectors. Finally, this section presents estimates of how the proposed change will impact statewide employment.

Section 4 describes the methodology and approach the Statewide CASE Team used to estimate energy, demand, costs, and environmental impacts. Key assumptions used in the analyses can be also found in Section 4.

Results from the energy, demand, costs, and environmental impacts analysis are presented in Section 5. The Statewide Statewide CASE Team calculated energy, demand, and environmental impacts using two metrics: (1) per unit, and (2) statewide impacts during the first year buildings complying with the 2016 Title 24 Standards are in operation. Time Dependent Valuation (TDV) energy impacts, which accounts for the higher value of peak savings, are presented for the first year both per unit and statewide. The incremental costs, relative to existing conditions are presented as are present value of year TDV energy cost savings and the overall cost impacts over the year period of analysis.

The report concludes with specific recommendations for language for the Standards, Appendices, Alternate Calculation Method (ACM) Reference Manual, and Compliance Forms.

This is a draft version of the CASE Report. The 2016 TDV values were not yet available when this draft report was being developed. The TDV energy and cost savings presented in this draft report were developed using 2013 TDV values. The TDV energy and cost savings presented in this draft report were developed using 2013 TDV values and TDV cost saving are in 2011 dollars. The Statewide Statewide CASE Team will be submitting a revised version of this report in fall 2014, which will include the final recommended code change proposal and a updated TDV energy and cost savings results that use the 2016 TDV values



2. MEASURE DESCRIPTION

2.1 Measure Overview

2.1.1 Measure Description

The measure consists of two alternatives for accomplishing improved building thermal envelope and reduced HVAC distribution losses in residential buildings. These two approaches will have similar energy impacts on the building.

- **High Performance Attics** (HPA) implements measures that minimize temperature difference between the attic space and the conditioned air being transported through ductwork in the attic
- **Ducts in Conditioned Space** (DCS), locates ducts and air handlers in the building's thermal and air barrier envelope. Installing ductless systems meets the DCS requirement.

Appendix B: DCS and HPA Strategies provides examples of various DCS and HPA strategies.

The proposed measures will add or modify mandatory and prescriptive requirements related to attic, roof, air handler, and ducts in residential buildings. The proposed measures will modify compliance options for ductless systems and add or modify modeling procedures for all of the above measures in the performance method. Details are provided in Section 2.2 of this document.

As a result of the change, the Standards will address energy issues related to air losses from air handlers and ducts in attics while allowing several compliance options to meet the requirements with alternate systems or strategies. The proposed change does not modify or expand the scope of the Standards themselves.

2.1.2 Measure History

Common construction practice in California is slab-on-grade, with air handlers and associated ductwork located in an unconditioned attic. During the cooling season, particularly in the Central Valley and other inland climates, attic temperatures can reach temperatures much higher than the outside air temperatures (Lstiburek 2013, BSC 2010, EPA 2000), resulting in loss of cooling capacity delivered to the interior and increased energy use by the HVAC system to provide desired occupant comfort.

For the 2013 Title 24 Building Energy Efficiency Standards, the Statewide CASE Team analyzed a set of measures to reduce undesirable heat gain and loss through the roof assembly and to improve duct conditions (AEC/HMG)³. The team established a vented attic package,

which initially included cool roof requirements, roof deck insulation, raised heel trusses and increased duct insulation. Modeling capabilities were also developed to account for the derating of insulation value when insulation is compressed at the eave (e.g. when a raised heel trusses is not used). However, the final adopted code language only modified cool roof solar reflectance requirements, increased duct insulation and required radiant barrier in specific climate zones.

The measures from the 2013 CASE that did not get adopted in the 2013 standards did not meet cost feasibility criteria based on the CEC's imposed threshold of \$2000 incremental costs for all new residential building measures. Also roof deck insulation faced substantial building industry pushback. The CEC contracted the Building Science Corporation (BSC), a leader in advanced building methods, to conduct a moisture analysis for this option. The results indicated that air permeable insulation may be installed under the roof deck of a vented attic without moisture issues in all climate zones but CZ16. The report laid out the necessary steps required to prevent moisture issues due to roof deck insulation in a vented attic (BSC 2011⁴). The CEC rejected the measure due to industry concerns.

Currently, there are several national programs and organizations promoting the adoption of high performance residential building envelopes and ducts in conditioned space. The DOE Challenge Home (recently renamed the "DOE Zero Energy Ready Homes" initiative) launched new national program requirements in 2012 (and updated April 21, 2014⁵) that require ducts in conditioned space as a mandatory requirement for participation under the prescriptive path. There are several alternatives allowed to ducts in conditioned space including unvented/unvented attics, unvented crawl spaces, and ductless systems. DOE Building America's ongoing research projects showcase case studies and produce measure guidelines that demonstrate the options and benefits of implementing these advanced measures. The National Association of Home Builders (NAHB) has produced guidelines and case studies to inform builders and assist in identifying solutions to possible barriers for moving ducts into conditioned space.

California utilities are researching these design options through emerging technology projects and working with builders to increase their knowledge and experience. Both Southern California Edison (SCE) and Pacific Gas & Electric (PG&E) are conducting projects that work directly with builders through the design process, selection of measures, and construction phase for implementing DCS or HPA strategies. SMUD's Home of the Future program encourages locating ducts and equipment in conditioned space and other advanced building techniques. The utility emerging technology programs and projects provide expertise and assistance with the technical and implementation barriers for builders to make the transition; these efforts inform and greatly support the development of the CASE study. In addition to

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⁴ www.buildingscience.com/documents/reports/rr-1110-hygrothermal-analysis-california-attics

⁵ energy.gov/sites/prod/files/2014/04/f15/doe zero energy ready home requirements rev04.pdf

these programs, a national production builder has made ducts in conditioned space a standard feature for all homes, and other advanced home builders are investigating these options.

2.1.3 Existing Standards

2013 Title 24 Building Energy Efficiency Standards

The 2013 Title 24 Standard currently includes prescriptive requirements for several of the measures and construction techniques we are proposing for the 2016 update. The prescriptive requirements in Table 150.1- A relevant to this CASE topic include:

Table 5: 2013 Title 24 Part 6 Prescriptive Measures in Table 150.1-A

	Climate Zone					
Building Component	1	2-10	11	12-13	14-15	16
Roof/Ceiling Insulation	U 0.025 R 38 R 30		U 0.025 R 38			
Radiant Barrier	NR		F	REQ	*	NR
Duct Insulation R 6		R 6	R 8	R 6	R	. 8

Roof deck insulation, whether above or below, is not specifically required as a prescriptive requirement. Duct sealing became a mandatory measure in the 2013 Title 24 Standards in all climate zones. Section 150.0(m)11 requires a total duct system leakage of 6% or less of the nominal air handler airflow, as confirmed through a HERS rater field verification.

The 2013 software designates the default location of the air distribution system for the performance calculations but the Standards do not regulate the location of ducts and air handler equipment. There is no requirement in the Standards for a specific duct surface area. The ACM specifies a default total supply duct surface area, and allows the user to input a lower value. If a lower value is used, additional verification and documentation for certified low leakage air handler unit is required.

Alternative design and construction techniques, including raised heel or extension trusses are not specified in the Standards, however the 2013 CBECC-Residential software can model raised heel trusses and fully extended ceiling insulation to capture the energy benefits of these techniques.

2012 International Energy Conservation Code (IECC)⁶

Section R402.2.1 Ceilings with attic spaces sets requirements for ceiling insulation similar to those in 2013 Title 24. In addition, IECC allows raised heel trusses to meet the insulation

⁶ http://publicecodes.cyberregs.com/icod/iecc/2012/icod_iecc_2012_re4_sec002.htm

requirements with lower insulation levels installed at the ceiling. For example, when Section R402.1.1 requires R-38 in the ceiling, R-30 is deemed to satisfy the requirement wherever the full height of uncompressed R-30 insulation extends over the wall top plate at the eaves (through raised heel truss). Similarly, R-38 shall be deemed to satisfy the requirement for R-49 wherever the full height of uncompressed R-38 insulation extends over the wall top plate at the eaves. This reduction shall not apply to the U-factor alternative approach in Section R402.1.3 and the total UA alternative in Section R402.1.4.

Section R403.2.2 Ducts requires R-8 duct insulation on all supply lines in attics and has a total duct tightness requirement of 4 cubic feet per minute per one hundred square feet of conditioned floor area (with handler) at 25 Pascal. This is equal to 28 cfm per ton of AC capacity at one ton for each 700 square foot of conditioned floor area, which is 7% of the flow. Ducts that are located completely inside the building thermal envelope are exempt from the duct insulation requirement or the total duct leakage requirement. In addition, it requires that air handlers have an air leakage rate of no more than 2% of the design air flow rate, tested in accordance with the ASHRAE 193 standard.

2.1.4 Alignment with Zero Net Energy Goals

The proposed modifications to the residential standards are aligned with California's ZNE goals, and are supported by the current IOU residential single family new construction program, California Advanced Homes Program (CAHP).

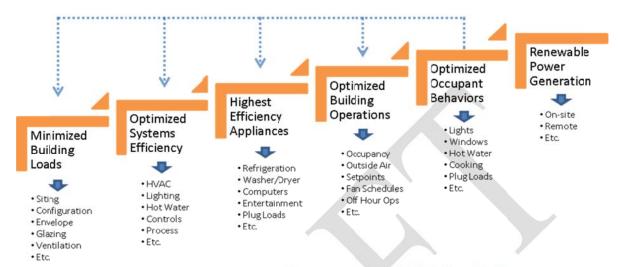
A guiding principle for the "Road to ZNE" project⁷ is that the ZNE goals will be most beneficial to California if a proper loading order is established. The loading order or 'steps to ZNE buildings' includes:

- Minimizing building loads
- Optimizing system efficiency based on equipment efficiency, installation, and usage patterns
- Using highest efficiency appliances, such as high efficacy lighting
- Optimizing building operations to better meet occupant and energy efficiency needs, including controlling plug loads
- Improved occupant interactions with the building
- Renewable power generation when feasible and as a last step for a ZNE building

-

⁷ The Road to ZNE Report CALMAC PGE0327.01

Table 6: Steps to Achieving ZNE Designs for Individual Buildings⁸



Steps to ZNE Buildings

The *Road to ZNE* report highlights the importance of prioritizing energy efficiency before employing renewable power generation to meet ZNE for all buildings. The first step is to minimize building loads, which is the goal of this CASE measure.

Additionally, the proposal for ducts in conditioned space aligns with the recommendation in the *Technical Feasibility of Zero Net Energy Buildings in California* report written by Arup for the California IOUs.⁹

Section 7.1.5 Residential Ducts in Conditioned Space of the study describes the ZNE rationale to support ducts in conditioned space (underlines provided by the Statewide CASE Team for emphasis)¹⁰.

The State will always be challenged in meeting its efficiency goals, and in particular in meeting its peak load reduction goals, if residential air conditioning systems are operating in high temperature attics. There are a number of viable ways to solve this challenge, and builders should be provided with a host of options to do so. The most promising approach from a constructability standpoint appears to be moving the entire HVAC system out of the attic.

⁸ Executive Summary section in the *Road to ZNE* Report linked in the prevous footnote

 $^{^9\,}http://www.energydataweb.com/cpucFiles/pdaDocs/904/California_ZNE_Technical_Feasibility_Report_Final.pdf$

¹⁰ Page 52 of the *Technical Feasibility* Report linked in the previous footnote

A better insulated home, with high performance windows, proper orientation, and ducts in the conditioned space can have considerably lower air conditioning loads than does a standard home today. That reduced load, in turn, allows for a much smaller duct system to provide the necessary cooling. The reduced duct sizing facilitates installation when the HVAC system is no longer located in the attic. Hydronic delivery systems are another viable strategy, with additional potential fan energy savings.

Recommendation: <u>Rather than continuing to focus on ways to reduce attic temperatures</u>, it appears that residential building standards should <u>instead work towards moving HVAC systems within the conventional building envelope</u>. Isolating the home from attic heat is then a much simpler problem, solved by adding additional blown-in insulation (<u>perhaps with a raised heel truss</u>). A builder could, through the Title 24 performance compliance process, achieve the same energy benefits by providing <u>sufficient insulation at the roof deck</u> if the builder preferred that method.

2.1.5 Relationship to Other Title 24 Measures

This DCS/HPA CASE topic is synergistic with the Residential High Performance Walls topic as both studies propose ways to increase the energy performance of building envelope.

2.2 Summary of Changes to Code Documents

The sections below provide a summary of how each Title 24 documents will be modified by the proposed change. See Section 6 of this report for detailed proposed revisions to code language.

2.2.1 Catalogue of Proposed Changes

Scope

Table 7 identifies the scope of the code change proposal. This measure will impact the following areas (marked by a "Yes").

Table 7: Scope of Code Change Proposal

			Compliance		Modeling	
Mandatory	Prescriptive	Performance	Option	Trade-Off	Algorithms	Forms
Y	Y	Y	Y	Y	Y	Y

Standards

The proposed code change will modify the sections of the California Building Energy Efficiency Standards (Title 24, Part 6) identified in Table 8.

Table 8: Sections of Standards Impacted by Proposed Code Change

Title 24, Part 6 Section Number	Section Title	Mandatory (M) Prescriptive (Ps) Performance (Pm)	Modify Existing (E) New Section (N)
150.0 (g)	Vapor Retarder	M	Е
150.0 (h)	Space-Conditioning Equipment: 1. Building Cooling and Heating Loads	M	Е
150.0 (m)	Air-Distribution and Ventilation System Ducts, Plenums and Fans: 1. CMC Compliance 11. Duct System Sealing and Leakage Testing	M	E
150.1	Performance and Prescriptive Compliance Approaches for Newly Constructed Residential Buildings	M	E
150.1 (b)	Performance Standards: 4. Compliance Demonstration Requirements for Performance Standards B iii. Low Leakage Air Handler	Pm	E
150.1 (c)	Prescriptive Standards: 1. Insulation A. Roof/Ceiling insulation 2. Radiant Barrier 9. Space Conditioning Ducts 11. Roofing Products 12. Ventilation Cooling Table 150.1-A COMPONENT PACKAGE-A Standard Building Design Roofs/Ceilings Radiant Barrier Ducts: Duct Insulation	Ps	E/N

Appendices

The proposed code change will modify the sections of the indicated appendices presented in Table 9. If an appendix is not listed, then the proposed code change is not expected to have an effect on that appendix.

Table 9: Appendices Impacted by Proposed Code Change

RESIDENTIAL APPENDICES				
Section Number	Section Title	Modify Existing (E) New Section (N)		
	Residential HERS Verification, Testing, and			
RA2	Documentation Procedures	Е		
	Residential Field Verification and Diagnostic Test			
RA3	Protocols	Е		
RA4	Eligibility Criteria for Energy Efficiency Measures	Е		

Modifications will be made in the Residential Appendix to field testing procedure requirements and protocols associated with each of the DCS approaches and the HPA package. The proposed code change will modify Residential Appendices RA2 for HERS verification, testing and documentation procedures, RA3 for residential field verification and diagnostic test protocols, and RA4 for eligibility criteria for energy efficiency measures. The proposal will update Table RA2-1 Summary of Measures Requiring Field Verification and Diagnostic.

The proposed measure will require updates, deletion, and consolidations to the following subsections of RA3 for verification of installing ducts in conditioned space and quality insulation installation:

- 3.1 Field Verification and Diagnostic Testing of <u>Air Distribution Systems</u>
 Table RA3.1.2 Duct Leakage Verification and Diagnostic Test
 Protocols and Compliance Criteria
 - 3.1.4 Verification and Diagnostic <u>Procedures</u>
 - 3.1.4.1 Diagnostic Supply Duct Location, Surface Area and R-value¹¹
 - 3.1.4.1.1 Verified Duct System Design:
 - 3.1.4.1.2 Verification of 12 Linear Feet or Less of Duct Located Outside Of Conditioned Space¹²
 - 3.1.4.1.2 Verification of Ducts Located In Conditioned Space
 - 3.1.4.1.4 Verification of Supply Duct Surface Area Reduction
 - 3.1.4.3.8 Verification of Low Leakage Ducts in Conditioned Space Compliance Credit
 - 3.1.4.3.9 Verification of Low Leakage Air-Handling Unit with Sealed and Tested Duct System
- 3.5 Quality Insulation Installation Procedures
 - 3.5.1 Purpose and Scope
 - 3.5.3.3 Roof/Ceilings (Batt and Blanket)
 - 3.5.3.3.1 Special Situation Enclosed Rafter Ceilings
 - 3.5.3.3.2 Special Situations Attics and Cathedral Ceilings
 - 3.5.4.3 Roof/Ceilings (Loose Fill)

¹¹ This proposal will add requirements for air handler location within conditioned space

¹² This existing compliance option is proposed to be removed

3.5.5.3 – Roof/Ceilings (Rigid Foam Board)

3.5.6.3 – Roof/Ceilings (SPF)

3.5.6.3.2 Special Situations – Attics and Cathedral Ceilings

The proposed measure will require minor modification to RA4 Eligibility Criteria for Energy Efficiency Measures:

4.2 Building Envelope Measures

4.2 Radiant Barrier¹³

4.2.1.1 For Prescriptive Compliance: The attic shall be ventilated¹⁴

Residential Alternative Calculation Method (ACM) Reference Manual

The proposed code change will modify the sections of the Residential Alternative Calculation Method References identified in Table 10.

Table 10: Sections of ACM Impacted by Proposed Code Change

Residential Alternative Calculation Method Reference			
		Modify Existing (E)	
Section Number	Section Title	New Section (N)	
2.3	Building Envelope	Е	
2.4	Building Mechanical Systems	Е	
2.6	Attics	E	
Appendix C	Special Features	E	

Simulation Computer Engine Adaptations

Some of the proposed code changes cannot be modeled using the current simulation engine. Changes to the simulation engine are necessary and the CEC and their contractors (CBECC-Res team) are actively working on implementing changes to enable modeling of the following features:

- Unvented attics the CBECC-Res team has developed draft rulesets and procedures
 that were used for this CASE analysis in a research version of the software. These
 rulesets need to be expanded and incorporated into the production version of the
 CBECC-Res software.
- Ductless systems The CEC is currently engaging manufacturers of ductless systems to ensure that the CBECC-Res software calculates energy performance of these systems appropriately. As of the writing of this report, the software does not model ductless systems with listed efficiency features. Instead the software considers ductless systems to have the same efficiency as the baseline Split DX system.
- Make the standard design the same for all options Currently standard design changes based on change in proposed design for attic measures. This has been fixed by CBECC-

¹³ The organization of subsection 4.2.1.1 regarding ventilation under 4.2.1 Radiant Barrier appears to be a mistake in the Residential Appendix.

¹⁴ This subsection does not have a title. Instead, it just started off with the requirement text.

Res team in the research version provided to the Statewide CASE Team and will be implemented in the production version of the software before the 2013 standards come into effect.

2.2.2 Standards Change Summary

This proposal would modify sections of the Building Energy Efficiency standards as shown in Section 2.2.1. See *Section 6.1 Standards* of this report for the detailed proposed revisions to the standards language.

2.2.3 Standards Reference Appendices Change Summary

This proposal would modify the following sections of the Standards Appendices as shown in Section 2.2.1. See *Section 6.2 Reference Appendices* of this report for the detailed proposed revisions to the text of the reference appendices.

2.2.4 Residential Alternative Calculation Method (ACM) Reference Manual Change Summary

This proposal would modify the following sections of the Alternative Calculation Method (ACM) Reference Manual as shown in Section 2.2.1. See *Section 6.3 Reference Appendices* of this report for the detailed proposed revisions to the text of the Alternative Calculation Method (ACM) Reference Manual.

2.2.5 Compliance Forms Change Summary

The proposed code change will modify the following compliance forms listed below. Examples of the revised forms are presented in *Section 6.5 Compliance Forms*.

2.2.6 Simulation Engine Adaptations

Please see Section 2.2.1 for these details.

2.2.7 Other Areas Affected

No other areas affected.

2.3 Code Implementation

2.3.1 Verifying Code Compliance

For the DCS strategies, visual inspections and associated compliance forms (installation and verifications) are required to confirm that duct and air handler <u>location</u> match the design strategy selected and duct <u>leakage rate</u> is within the allowed threshold. The proposed DCS package does not alter the procedure and requirement for compliance verification by code enforcement staff, with the exception of the unvented attic option.

Existing 2013 Title 24 requirements to be carried over to 2016 Title 24:

- Total duct leakage test is a mandatory requirement that applies to all new construction buildings, regardless of the DCS/HPA strategy chosen
- Ducts entirely in conditioned space: visual inspection
- HERS verified ducts entirely in conditioned space with low leakage ducts: visual inspection and duct leakage to outside HERS test

New proposed requirement:

Unvented attic: visual inspection and duct leakage to outside HERS test

The proposed HPA features are currently verified by field inspection. Duct leakage, which is a mandatory requirement under the 2013 Standards, already requires testing and verification. The enforcement process does not change. However, duct leakage to outside test is not required.

The reduced duct surface area is an existing compliance option and requires verification and documentation. In order to demonstrate and claim credit, builders and their designer and contractors must provide a duct layout and specify all duct sizes on the plans and provide surface area calculations. Raters and inspectors need to verify the installed duct design and layout and surface area calculations. The Statewide CASE Team proposes that the compliance software be improved to include duct surface area calculations. This way, it will become easier for the inspector to verify accuracy of information on the HERS forms.

2.3.2 Code Implementation

As proposed, the DCS strategy will change from being a compliance option to one of the available methods to meet the prescriptive requirements for roofs/ceilings. DCS strategies require increased coordination among builders, designers and HVAC contractors during the planning process as well as construction to effectively communicate design strategies and specific construction guidelines and techniques. Depending on the strategy chosen for DCS, other contractors such as roofers, framers, insulation installers, plumbers and electricians may be impacted. There will inherently be a learning curve for every DCS and HPA strategy, while builders investigate and implement various strategies, and contractors become comfortable with and understand the change in design and construction.

If adopted, these measures would mainly affect HVAC, roofing and insulation contractors, all of whom are familiar with Title 24 code verification requirement such as duct leakage tests and QII though they may have not direct experience with these procedures.

Costs associated with increased design, planning, and implementation of these strategies are a concern for builders. Certain strategies to meet the proposed requirements, such as polyurethane spray foam for roof deck insulation, could have relatively high incremental cost. However, the proposed requirements are based on measures and materials that are cost-effective using the CEC LCC calculations and are designed to provide a variety of design options. Thus builders can choose a measure or combination of measures that are most compatible with their design and match their construction practices, and cost considerations.

There are potential moisture management issues associated with roof deck insulation if proper installation procedures are not followed. The Statewide CASE Team has worked with industry stakeholders to identify potential solutions. Manufacturers of insulation and roof products have various methods of alleviating moisture issues that must be followed to ensure that the roof maintains structural and hygrothermal integrity.

Reducing duct surface area is currently a compliance option, but has not been widely used because of the difficulty and time required for documentation and verification. The procedure for demonstrating compliance may become easier to perform if HVAC system designs are more integral pieces of the overall building design. There are additional costs associated with HERS verification.

2.3.3 Field Verification and Diagnostic Testing

The DCS and HPA proposals will require field verification for some measures, some of which are in the current standards, including:

- Duct leakage test: diagnostic testing; mandatory for all new construction
- House pressurization test: diagnostic testing for compliance credit
- Verified low leakage with ducts entirely in conditioned space: visual inspection and field diagnostics test that run a duct leakage test and house pressure test tougher for compliance credit

Field verification and diagnostic tests that do not currently exist, or will be modified in the standards include:

- Roof deck insulation installation: to verify proper moisture management: field verification
- Insulation and air sealing to make a mechanical closet be inside the conditioned space: add language to the compliance forms for Ducts Entirely in Conditioned Space and the Verified case

2.4 Issues Addressed During CASE Development Process

The Statewide CASE Team solicited feedback from a variety of stakeholders when developing the code change proposal presented in this report. In addition to personal outreach to key stakeholders, the Statewide Statewide CASE Team conducted a public stakeholder meeting to discuss the proposals. The issues that were addressed during development of the code change proposal are summarized below.

Moisture Management – stakeholders raised concerns about potential moisture issues of above or below roof deck insulation assemblies. Based on our review of studies¹⁵ and conversations with a number of home builders with implementation experience and insulation manufacturers (spray foam, blown-in fiberglass), the Statewide CASE Team concludes that solutions and precautions, including proper sealing and insulation installation are available to address the issue. See Sections 9.1.4 (DCS) and 9.2.1 (HPA) for additional details.

Fire Rating – Roofing product manufacturers raised concerns on how the inclusion of above deck insulation will void their products' fire rating classifications. This is especially a concern for products used in Wildlife Urban Interface (WUI) regions, which require a Class A fire rating. The primary issue is that roof assemblies including above roof deck insulation (typically rigid foam board) have not yet been tested.

The Statewide CASE Team researched California's building fire code and relevant sections of Building Mechanical Codes to investigate the issues. The team also collected information on insulation product fire rating requirements and extensive product specification searches. The team then engaged and discussed the issues with roofing and insulation manufacturers and the Office of the State Fire Marshal to discuss implications from the code change proposal. Per the Statewide CASE Team's discussions with the roofing industry representative and the Office of the State Fire Marshal representative, application of above-deck insulation indeed affects the fire rating of the roof covering products. Even though the components of the roof assemblies (the insulation, the deck, the roof coverings) all meet their respective fire rating tests, further testing for certification purposes is required for roof coverings used in assemblies incorporating above-deck insulation products. See *Section 13* for more information.

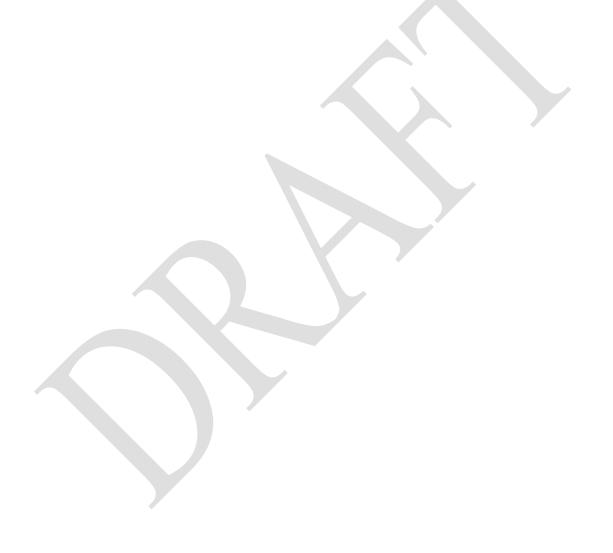
Ventilation for Roofing Products – Roofing manufacturers raised concerns that above-deck insulation physically prevents ventilation between the roof covering and deck below, causing the products to experience higher temperature and resulting in shorter product life. Through roof and insulation product research, review of ARMA literature recommendation and discussion with a roof manufacturer, the Team identified solutions to provide roof product ventilation when using above-deck insulation. Roofers may either use spacers (for asphalt shingles) or counter/elevated batten and other specialty products (for tile) to maintain the small gap to provide adequate ventilation under the roofing products. See Section 9.1.4 (DCS - Unvented Attic) and 9.2.1 (HPA) for more information.

Treatment and Test Requirement of Duct Leakage to Outside for DCS Strategies – There was concern that the duct leakage to outside test was too onerous to perform, and that most HVAC contractors and some HERS raters may find it hard to perform. This test is required and preformed for taking the DCS package of placing ducts in conditioned space. It involves a simultaneous house pressurization and duct leakage test. This test will likely be performed by a

Literature with specific emphasis on moisture management reviewed by the CASE team included a number of Building Science Corporation (BSC in appendix) reports with field and hygrothermal modeling results, technical bulletins from APA, SPFA, PIMA, as well as Building America's Solution Center on Above-deck insulation.

HERS rater because, according to industry interviews, most HVAC contractors do not have a house pressurization in their possession.

Use of Sealed Combustion Furnace – There was a concern that the requirement to place ducts into conditioned space (as part of the DCS strategy with vented attics) is federally pre-empted because it will require sealed combustion. Currently, sealed combustion furnaces are not widely installed because placing equipment in conditioned space is not common. The majority of products available are also condensing units and exceed the 80% AFUE set as the minimum in Title 20. The Statewide CASE Team proposed for DCS to be an alternative prescriptive path to the HPA package so to steer clear of pre-emption concerns. See details in *Section 3.1.1*.



3. MARKET ANALYSIS

The Statewide CASE Team performed a market analysis with the goals of identifying current technology availability, current product availability, and market trends. The Statewide Statewide CASE Team considered how the proposed standard may impact the market in general and individual market players. The Statewide Statewide CASE Team gathered information about the incremental cost of complying with the proposed measure. Estimates of market size and measure applicability were identified through research and outreach with key stakeholders including utility program staff, CEC, and a wide range of industry players who were invited to participate in a public stakeholder meeting that the Statewide Statewide CASE Team held in May 2014.

3.1 Market Structure

It is important to note that almost every Zero Net Energy (ZNE) or ZNE-capable or near-ZNE building designed and constructed in the state has included one or the other option for DCS/HPA. In this section, we identify the available products for achieving these strategies and the principal manufacturers/suppliers. The market structure descriptions demonstrate that these design strategies are achievable and products available from multiple providers. Discussions on market penetrations of these strategies and measures and viabilities are included later in the report, in Section 3.2 titled Market Availability and Current Practices.

3.1.1 Ducts in Conditioned Space (DCS)

DCS is primarily a design strategy that is achieved in the field through a set of construction techniques. Successful examples have been demonstrated through California's builder experience, California High Performance (CAHP) building programs and utility Emerging Technology projects. DCS as discussed in this report involves having both ducts and air handler within the building's thermal envelope or keep them out of unconditioned attics. There are several methods of achieving the design intent of the DCS approach as outlined in this section, which allows a homebuilder to select a method that works best with their design and construction practices.

Vented Attic Strategies

Vented attic strategies for installing ducts in conditioned space include the use of dropped ceiling, or the use of conditioned plenum space, or the use of open floor truss. The first two strategies involve additional framing, drywall and sealing needs depending on the "new space" for duct runs and whether it is above or below the ceiling plane. Scissor truss or plenum trusses can be used to create the furred-out conditioned plenum. Major manufacturers of trusses include national companies Alpine and MiTek as well as various regional companies. Construction materials associated with implemented these two strategies are widely used in residential new homes today.

Open-web floor trusses are commonly available component in residential construction from floor joist manufacturers such as RedBuilt, TrimJoist, SpaceJoist and Open Joist.

Use of vented attic DCS strategies would require placement of furnace in conditioned space as well which can be done in various ways depending on the dwelling floor plan.

Unvented Attic Strategies

Implementation of an unvented attic involves installation of roof deck insulation products and sealing the interior space to roof junction. A wide variety of roof deck insulation products are available; names of manufacturers organized by their product types are presented in Table 12 and Table 13.

Since the primary insulation layer in a building with unvented attic is at the roof deck, below-deck spray polyurethane foam is typically used to achieve the higher insulation value needed. However, unvented attic construction can also utilize a combination of above- and below-deck insulation at the roof deck. Even though a unvented attic construction allows the ducts and equipment to remain in the attic space, it would require a sealed combustion furnace.

Sealed Combustion Furnaces in Conditioned Space

Part of the DCS strategy includes placing equipment in conditioned space. Some builders are using a hot water coil in an air handler for heating because furnace capacities are too large. The system known as "combined hydronic" since the same water heater is used for both heating and domestic hot water. This approach meets the "in conditioned space" requirement by being in an indoor location. With the use of a furnace this could be accomplished by housing equipment in dedicated mechanical closets within the thermal boundary of the building or in a sealed (or unvented) attics. If a gas furnace is installed within conditioned space, it must be a sealed combustion furnace which takes no combustion air from the indoors.

Currently, the majority (~95%) of sealed combustion furnaces are condensing units (AHRI Directory of Certified Products, accessed April 2014).

The Statewide CASE Team utilized the certified product database hosted by AHRI website to assess the prevalence of qualifying furnaces on the market. The results are shown in Table 11. In summary, almost 90% of all available furnaces are gas powered. Of the gas furnaces, noncondensing models account for 68%, and "direct vent" (the database's equivalent to "sealed combustion) models account for 33%. A review of the current AHRI database showed that there are limited manufacturers and numbers of models of sealed combustion gas furnaces –2 manufacturers, each with 6 models (distinct model numbers) – at the minimum AFUE.

Table 11: AHRI Database Summary for Residential Furnaces

Search Criteria	Number of models	% of all active gas models
All active models	6951	
All active gas furnaces	5435	100 %
Condensing	1723	32%
Non-condensing	3742	68%
"Direct vent"	1802	33%
Non-condensing + "Direct vent"	91	2%
Non-condensing + "Direct vent" at federal minimum efficiency	12	<1%

The Statewide CASE Team reviewed the CEC Appliance Efficiency Database to determine the number of certified products meeting these requirements. However, because the requirement for identifying the unit as natural draft was added recently, the majority of units in the database do not specify this information.

A key consideration at this point in time is whether the limited number of sealed combustion (non-weatherized) gas furnaces at the Federal minimum AFUE level of 80% is a trigger for pre-emption concerns if sealed furnaces are necessary in the DCS approach. Further discussions are necessary with the CEC codes and standards as well as CEC legal staff on this issue. It is probable that more models would be offered by OEMs if major builders were to use DCS since no new technology is required.

If sealed combustion equipment cannot be required due to pre-emption concerns, other system types such as combined hydronics or ductless systems are available options for providing heat but again discussions are necessary with the CEC on how they could be incorporated into the prescriptive path.

Roof Deck Insulation

Roof deck insulation can either be placed above deck with rigid insulation or below deck with a number of insulation types available.

Above Deck Insulation

Rigid insulation, also called foam board or board insulation, is a viable method of reducing thermal bridging and heat transfer through the roof. There are three main product types available for application above a roof deck:

- Polystyrene
- Polyisocyanurate
- Polyurethane

Polystyrene comes in two types: Expanded Polystyrene (EPS) and Extruded Polystyrene (XPS); both are water resistant. XPS typically has a slightly higher R-value per inch (R-5 compared to R-4) and a lower water permeability than EPS.

Polyisocyanurate (polyiso) has the highest R-value per inch and can be air and water impermeable depending on the facing. The polyiso industry has also has products available with integrated nailable bases. Products with integrated nailable bases come with spacers on top of the rigid board that support a wood sheathing layer. The design provides the nailable base needed for installation with asphalt shingles as well as more roof for continuous ventilation below the roofing products to prolong product service life¹⁶.

Polyurethane foam board can come in open or closed-cell forms. All closed-cell products are air and water impermeable (when applied with a layer thicker than 2"), while some open-cell products are not, and closed-cell generally has a higher R-value per inch. Above deck product types by manufacturer are provided in the table below:

Table 12: Above-Deck Insulation Types and Manufacturers

Above-Deck Insulation Type	Company/Manufacturer
Polystyrene (EPS and XPS)	ACH Foam Technologies, Atlas Roofing, Dow Chemical, INSULFOAM, Owens Corning Foam
Polyisocyanurate (Polyiso)	Atlas Roofing, Carlisle Syntec, Dow Chemical, Hunter Panels
Polyiso + nail base	Atlas Roofing, Hunter Panels, Thermasote
Polyurethane Board	Dow Chemical, Duna USA, Dyplast Products, ITW Insulation Systems

¹⁶ Example product images are available at http://www.polyiso.org/

Below Deck Insulation

There are several product options and manufacturers for below-deck insulation. A sample of manufacturers is provided in Table 13. Cellulose and mineral wool insulation are available both as batt and loose fill products. Batt is the least expensive option. Loose-fill and blown-in are better than batts in hard to fill spaces (DOE 2012). Even though loose-fill installation requires a netting system and special equipment, it still tends to be less expensive than spray polyurethane foam (SPF). Both open cell and closed cell SPF are the more expensive options for below-deck application, but they provide better air-sealing and closed cell SPF provides better moisture migration prevention abilities¹⁷.

Table 13: Below-Deck Insulation Type and Manufacturers

Below-Deck Insulation Type	Company/Manufacturer
Batt (Cellulose or Mineral)	Applegate Insulation Systems, Bonded Logic, Bay Insulation of California, CertainTeed
Loose Fill/Blown-in (Cellulose or Mineral)	Applegate Insulation Systems, Cell Park, CertainTeed, Guardian Fiberglass Insulation, Hamilton MFG Inc.
Spray Polyurethane Foam (open and closed cell)	Arnco Construction Products, BASF, Bayer Material Science, CertainTeed, Dow Chemical

Ductless Systems

Ductless systems may be used to meet the ducts in conditioned space criteria. Many HVAC equipment manufacturers carry a selection of ductless systems, as shown in the following table.

Table 14: Ductlass System Type and Manufacturers

Ductless System Type	Manufacturers (sample)
Mini-split heat pump	Carrier, Daikin AC, Fujitsu General America, Gree Comfort, Lennox, Mitsubishi, Ramsond, Trane
Hydronic system	Baxi, Grand Hall Enterprises Co. Ltd., HTP Inc., Noritz America Corp., Takagi Industrial
PTAC/PTHP	ACP International Ltd., Airedale North America, Carrier, Daikin AC, General Electric, Gree Comfort, Sharp Electronics

3.1.2 High Performance Attics (HPA)

The HPA option is a package of measures including one or more of the following:

¹⁷ Both open-cell and closed-cell spray foam can act as air barriers (when a layer thicker than 2" and 5 ½" is used for open-cell and closed-cell respectively). In terms of vapor permeability, open-cell is moisture permeable and needs a vapor retarder on its interior surface, and closed-cell is a Class II vapor retarder at more than 2".

- Roof deck insulation: above or below deck
- Increase duct insulation
- Lower duct leakage rate
- Raised Heel Trusses or Extension Trusses
- Reduce Duct Surface Area

Roof Deck Insulation

Please refer to discussion of roof deck insulation products in Section 3.1.1.

Increased Duct Insulation

Duct insulation is integrated with flex ducts; the designer specifies the insulation value, and then the ducts are manufactured and brought on-site. Manufacturers supply distributors with duct insulation products, which are then available to HVAC contractors who stock the products for use on job sites.

Ducts are then placed into the home with insulation already included. Multiple industry experts stated that the R-8 ducts are difficult for contractors to place because they are less maneuverable than ducts with R-6 insulation so there may some impacts on installation time and thus labor costs.

Reduced Duct Leakage

Current Title 24 standards require a maximum duct leakage of 6% as verified by a HERS rater test. HERS duct leakage testing, using a Duct BlasterTM, is common practice and has been used prior to the 2013 standards to achieve compliance credit (2013 Title 24 made this a mandatory measure). This proposal would require a verified leakage rate lower than 6% - potentially 4% or 5% depending on the results of the cost-effectiveness analysis.

Input from five high performance building experts, including HERS raters, energy consultants and builders, note that to get to 4% or lower total leakage rate a factory-sealed low leakage air handling Unit (LLAH) and/or performing sealing tasks is required. This is because in general LLAH lowers the duct leakage level by roughly 2%.

Currently, a "LLAH verification and sealed and tested duct system" compliance credit is available for the 2013 Title 24 Standards. The 2013 changes to JA9.2, the leakage rate for a low leakage handler was modified to 1.4% at a total external static pressure of 0.5 inch of water column (IWC). Air handler manufacturers will have to certify their equipment to the new standard for submission and admission into the CEC databases.

Reduce Supply Duct Surface Area (Duct Design/Layout)

Designing ducts according to ACCA Manual D is performed as part of the HVAC design process. The duct layout and sizing schedule are included on the construction documents. Although duct systems are designed and included in the construction documents, most HVAC contractors may not always follow the plans. Ductwork is typically installed wherever it fits, with little reference made to the drawn plans or awareness to the length and placement of duct runs. The goal of this proposal is to promote efficient duct designs, including elements such as

shorter runs, "right" sizing and ceiling supply registers located at the interior instead of exterior walls

Energy Truss (Raised Heel or Extension Truss)

Special (non-standard) trusses can be used to improve and increase the effective ceiling insulation levels in the attic. With traditional truss design or rafter roofs, the ceiling insulation laid out on the attic floor is compressed at the edges. This compression causes the insulation property to diminish, and the attic edges allow more energy loss as a result and become the weak points of the thermal boundary. Major manufacturers for trusses who can supply raised heel or extension truss include Alpine and MiTek.

Alternate approach to meet HPA - Buried Ducts

Buried ducts are currently recognized as a compliance credit that requires HERS verification. The Standards treat buried ducts in the same way as High Performance Attics. The same total duct leakage (6%) requirement applies. This may be a straight forward and viable option and relatively easy to verify, and is encouraged by the DOE Challenge Homes if ducts are placed in a vented attic¹⁸.

3.2 Market Availability and Current Practices

3.2.1 Overview of Market Acceptance of DCS/HPA

DCS and HPA strategies are relatively new to the market place; however, a growing number of builders (production and custom) are including these strategies in their high performance homes as shown in Table 15. Almost all ZNE homes in the state and elsewhere incorporate one of the methods being proposed in this CASE measure.

Table 15: Home Builders in California with DCS Strategy Experience

Strategy Implemented	Builders with DCS strategies implementation experience	
Dropped ceiling	Elliott Homes, De Young Properties, GJ Gardner	
Conditioned plenum	Pulte Homes, K. Hovnanian Homes, GJ Gardner, Wathan Castanos, Northwest Homes	
Unvented attic	Meritage Homes, RJ Walter Homes, Mission West Properties, Inc., Shea Homes, KB Homes, Brookfield Homes	
Ductless systems	Brookfield Homes	

There are several efforts underway in California and nationally to support DCS/HPA such as:

California utilities Emerging Technology Projects: PG&E, SCE, SMUD

¹⁸ http://www.energy.gov/sites/prod/files/2014/04/f15/doe_zero_energy_ready_home_requirements_rev04.pdf See footnote 16 to Exhibit Table 1 (DOE Zero Energy Ready Home Mandatory Requirements) on buried ducts.

- National Programs
 - DOE Building America¹⁹
 - DOE Challenge Home²⁰ Now called "DOE Zero Energy Ready Home" as of April 21, 2014
- National Association of Home Builders (NAHB) Home Innovation Research Lab guidelines for ducts in conditioned space²¹

Table 16 provides a snapshot of the strategies promoted by these national programs and California utilities:

Table 16: Ducts in Conditioned Space Strategies in High Performance Building Programs

		CA Utilities Emerging Technology Programs			National Programs	
Design Strategy	PG&E	SCE	SMUD	Building America	DOE Challenge Home	
Dropped ceiling	•			•	•	
Conditioned plenum	•	•		•	•	
Open web truss				•	•	
Unvented attic	•	•	•	•	•	
Ductless systems	•				•	

The California Emerging Technologies (ET) programs have successfully implemented DCS and HPA strategies throughout California as summarized in Table 17. The programs have produced case study reports to assist and inform builders about the opportunities, benefits and findings when adopting advanced building practices such as DCS. The PG&E ZNE pilot project has five builders participating with a total of eight homes. The projects are a mix of single story and two-story houses ranging from 1,800 to 3,200 square feet located in various northern California climate zones and have implemented dropped ceilings, sealed attics and modified trusses. The SCE Green Door project is a two-story 1,828 square foot house with a sealed attic with closed-cell spray polyurethane foam below the roof deck and installation of ductless mini-split heat pump system. The PG&E and SCE teams collect valuable implementation technique information. To characterize the energy performance of these projects, the teams performed house pressurization and duct leakage tests. The ET teams also performed continuous performance monitoring on a subset of these buildings to enable deeper assessment of the various strategies implemented. SMUD's Home of the Future program has

¹⁹ U.S. Department of Energy. EERE, Building America: http://www.energy.gov/eere/buildings/building-america-bringing-building-innovations-market

²⁰ U.S. Department of Energy. EERE, Challenge Home: http://www.energy.gov/eere/buildings/doe-challenge-home

²¹ http://toolbase.org/pdf/techinv/ductsinconditionedspace_techspec.pdf

three project homes, located in Sacramento, that implemented sealed attics through roof deck insulation and, in one case, structurally insulated panels (SIPs) roof.

Table 17: High Performance Building in California with DCS/HPA

Project Type	Roof/Ceiling	Ducts & Indoor Equipment	CZ	Status/Number of Homes Built
J	conditioned plenum	Indoor mechanical closet		
Production	above ceiling plane	with ducts in conditioned		starting construction on five
Bldr	using modified truss	plenum	13	homes
	conditioned attic			
	with R-30/38 spray			have been building this way
Production	foam under roof	ducts and equipment in		since 2011; 3700 built/sold in
Bldr	deck	conditioned attic	Various	CA to date, 18,000 nationwide
	R-38 + air barrier,			
Production	conditioned plenum	Indoor mechanical closet		
Bldr	above ceiling plane	with ducts in plenum	11	under construction
		ducts in conditioned plenum,		
Production	conditioned plenum	furnace in interior closet or		
Bldr	space	unconditioned attic	Various	production advanced houses
		ducts in dropped ceiling		
Production	dropped ceiling	projects; considering open		
Bldr	below ceiling plane	web floor truss	12	production advanced houses
Production				
Bldr	ccSPF below deck	Multi mini-splits (ductless)	10	ZNE production house
DOE				
Challenge	R-22 blown-in with	ducts and equipment in		
Home	netting	conditioned attic	10	construction complete
	R-11 batt at roof			
Modified	deck; R-38 ceiling	R-8 attic ducts; 4% duct		
existing	insulation	leakage	12	construction complete
	R-38 + air barrier,			
	conditioned plenum	Indoor mechanical closet		
	above ceiling plane	with ducts in conditioned		complete, considering another
Test House	using modified truss	plenum	13	test house
	conditioned attic;			
-	spray foam(R-50)	10		
Demonstration	insulation + air	ducts and furnace in	10	CMID II CA E A
House	barrier at roof deck	conditioned attic	12	SMUD Home of the Future
	conditioned attic;			
Dama an atmatic ::	insulation + air	duate and Companie		
Demonstration	barrier at roof deck	ducts and furnace in	12	CMID Home of the Future
House	(R-38)	conditioned attic	12	SMUD Home of the Future
	dropped ceiling			
Demonstration	below ceiling plane; R-49 blown-in with	ducts and handler in dropped		
House	RB in the attic	* *	12	ZNE demonstration house
	KD III UIE attic	ceiling	13	ZIVE demonstration house
Production Bldr	Typical	Multi mini-splits (ductless)	1	26 lots planned
DIUI	Typical	ivium mini-spins (duchess)	1	20 iots pianned

In addition to California, there are builders implementing these strategies in other parts of the nation, as shown in Table 18. Although construction practices are not always aligned throughout the U.S., these builders have implemented techniques discussed in this study.

Table 18. High Performance Building in the U.S. with DCS/HPA

Project Type	Roof/Ceiling	Ducts & Indoor Equipment	CZ	Status/Number of Homes Built
Production Bldr	conditioned attic with netted blown cellulose	ducts in conditioned attic	Las Vegas NV	started building this way since 2008; ~1500/yr in Vegas metro area
Production Bldr	spray foam under roof deck	ducts in conditioned attic	San Antonio TX	for all its homes since 2008
Production Bldr	vented attic with R-49 blown-in cellulose	ducts in dropped ceiling or open web truss; with interior mech closet	Northwest	4 test homes in 2008
Production Bldr	vented attic with R-49 blown-in cellulose	ducts in open web truss with interior mech closet	Northwest	300 in 2008
Production Bldr	vented attic with R-38 to R-42 blown-in cellulose	ducts in open web truss; handler in 2nd floor sealed utility closet	Seattle, WA	37 detached townhouses
Production Bldr	vented attic with R-49 blown-in cellulose	ducts in open web truss; handler in sealed utility closet in the garage	Portland, OR	20 homes
Production Bldr	R-38 open-cell spray foam under roof deck	ducts in conditioned attic; heat pump	Aztec NM	132 homes completed in AZ, NM and CO

The DOE Building America program utilizes national laboratories and research teams, including Davis Energy Group, ConSol, Building Science Corporation, CARB (led by Steven Winters Associates), and IBACOS, to provide technical support and implementation expertise to investigate improved building practices. Publications from the Building America program are located in an extensive library²² available to the public and industry members. These publications include research reports on ducts in conditioned space, reports and findings from projects that have implemented advanced building strategies, and best practice guidelines for industry trades. Building American has established a Building America Solution Center to provide builders with detailed measure descriptions, code references, implementation tips and case studies.

The DOE Challenge Home was established based on the innovation and best practices resulted from the Building America program. The Challenge Home Program provides builder resources

²² http://www1.eere.energy.gov/library/default.aspx?page=2&spid=2

and trainings, including marketing materials and access to profiles and case studies from participating builders. Challenge Home provides the opportunity for innovative builders who are early adopters and pursue high performance strategies such as DCS to receive recognition for their commitment and efforts.

3.2.2 Multiple Options for Ducts in Conditioned Space and High Performance Attics

As identified in Section 3.2.1 there are multiple methods that have been tried, tested and used by various home builders across California as well as the rest of the nation. In Appendix B of this document, we provide details on these construction/design options and provide the potential pros and cons of the various options.

3.2.3 Need for Additional Training and Industry Support

Despite the increasing use of DCS design strategies, additional support to designers, builders, subcontractors (HVAC, insulation, drywall, etc.), site superintendents is needed including design guidelines, fact sheets, training classes, and informational materials. The placement of ducts in conditioned space requires planning and integration of the HVAC system with other building systems and components which is currently not common practice. It is essential to communicate the DCS plan from the beginning for successful implementation and avoidance of errors. In addition to coordination between designers and HVAC contractors, communication must occur with other building trades that might experience impacts to their routine schedules and installation practices. These trades will also require training to correctly implement these construction techniques. For instance, electricians and plumbers must be made aware of the HVAC design plans and where penetrations can and cannot be made. In order to ensure plans and direction are followed, additional project oversight will be required.

The following are reports and best practice guidelines that provide insight and recommendations for trade coordination and design implementation from projects that have implemented DCS strategies, such as those listed above. A partial list of currently available (as of April 2014) resources is:

- CEC 2003 Home Builders Guide to Ducts in Conditioned Space http://www.energy.ca.gov/2003publications/CEC-500-2003-082/CEC-500-2003-082-A-16.PDF
- CEC 2003 Residential Duct Placement: Market Barriers http://www.energy.ca.gov/2003publications/CEC-500-2003-082/CEC-500-2003-082-A-30.PDF
- DOE EERE Measure Guidelines: Summary of Interior Ducts in New Construction, Including an Efficient, Affordable Method to Install Fur-Down Interior Ducts http://www.fsec.ucf.edu/en/publications/pdf/FSEC-RR-385-11.pdf
- DOE Building America Solution Center https://basc.pnnl.gov/
- DuctsInside.org for Building with Ducts in Conditioned Spaces, 2011; a joint project by the DOE and Northwest Energy Efficiency Alliance (NEEA) - http://ductsinside.org/

California IOUs provide classes and trainings that are available to audiences including builders, architects, HVAC contractors, HERS raters, building inspectors, and other audiences. Current classes and trainings available from various resources include:

- PG&E's Pacific Energy Center (PEC) and the Energy Training Center (ETC):
 - Introduction to ACCA Quality Installation Training Series: Manual J Equipment Sizing & Selection; Manual D and Advanced Manual D – Duct Design
 - Go Ductless California, Try Mini-Splits!
- SCE's Energy Education Centers:
 - Zero Net Energy Homes Design Fundamentals, Integrated Project Delivery, Enclosures and Assemblies, Mechanical Systems

3.3 Useful Life, Persistence, and Maintenance

Field inspection and diagnostic tests where applicable help secure the energy savings from proposed measures. All of the measures proposed are assumed to last for the entire residential building lifetime of 30 years.

The methodology the Statewide Statewide CASE Team used to determine the costs associated with incremental maintenance costs, relative to existing conditions, is presented in *Section 4.7.1*. The incremental maintenance costs of the proposed code change are presented in *Section 5.2.1*.

3.4 Market Impacts and Economic Assessments

3.4.1 Impact on Builders

The proposed DCS strategies will require designers to alter practices to implement these design changes. Depending on the design, trades that will see the most impact include roofers, insulation installers, framers and HVAC contractors. There will be a learning curve to communicate the design intent, details and associated testing requirements for the whole construction team. There are substantial cost implications as well; details on implementation costs are provided in *Section 5.2.1*.

The proposed HPA measure, with the exception of roof deck insulation, does not significantly change current builder practices. For roof deck insulation, builders will likely have to develop new standard procedures to ensure the roof assemblies address fire rating and moisture management requirements.

3.4.2 Impact on Building Designers

The proposed DCS strategies does not require substantial changes to the design practices. The designers and architects would, as always, consider and integrate the HVAC equipment and layout into the house design. Enhanced coordination between designers and HVAC designer is needed for designs that include moving ducts into conditioned space. Currently, HVAC

contractors are responsible for HVAC designs and layouts, but the system is not considered an integral component when planning the overall house design. Although there may be a modification in the design and planning process to focus around the HVAC system design, performing this step at the beginning of planning will minimize redesign and burden later in the construction process.

3.4.3 Impact on Occupational Safety and Health

The proposed code changes do not alter any existing federal, state, or local regulations pertaining to safety and health, including rules enforced by the California Department of Occupational Safety and Health (Cal/OSHA). All existing health and safety rules will remain in place. Complying with the proposed code change is not anticipated to have any impact on the safety or health occupants or those involved with the construction, commissioning, and ongoing maintenance of the building.

3.4.4 Impact on Building Owners and Occupants

If the proposed measures are implemented according to their design intent, the building and their systems should afford the occupants a more thermally comfortable living space. Since this measure is cost-effective, building owners who pay their energy bills are reducing their energy costs more than their mortgage costs are for the cost of the measure (i.e. there are experiencing net cost savings). For building occupants that are paying for their energy bills, since the measure saves more energy cost on a monthly basis than the measure costs on the mortgage as experiences by the building owner, the pass-through of added mortgage costs into rents is less than the energy cost savings experienced by occupants.

3.4.5 Impact on Retailers (including manufacturers and distributors)

The proposed DCS strategies may increase the demand for certain building products, such as various types of roof deck insulation, certified low-leakage air handlers and sealed combustion furnaces.

3.4.6 Impact on Energy Consultants

Energy consultants will continue to provide value by identifying and advising builders on design options and efficiency measures. Impact on energy consultants include understanding new prescriptive requirements and performance modeling rule sets.

3.4.7 Impact on Building Inspectors

Some of the proposed measures involve more detailed inspection process and time (i.e. reduced duct surface area), but none of the field verification aspects associated with proposed measures are new to the standards and how building officials conduct inspections.

3.4.8 Impact on Statewide Employment

The proposed measures will increase the demand for trades with specific skills, knowledge and experience working with these strategies and products. Examples of the increase workforce demand, include:

- HVAC contractor with design and installation experience with compact layout designs
- Roofing contractors with above-deck rigid foam boards installation experience.
- Insulation installers with roof deck product and procedures experience, including air sealing procedures for use of blow-in fiberglass below the roof deck and spray foam installers with appropriate certification.
- Framing contactors with experience incorporating modified trusses, such as raised heel, scissor or plenum trusses.

3.5 Economic Impacts

The proposed Title 24 code changes, including this measure, are expected to increase job creation, income, and investment in California. As a result of the proposed code changes, it is anticipated that less money will be sent out of state to fund energy imports, and local spending is expected to increase due to higher disposable incomes due to reduced energy costs. For instance, the statewide life cycle net present value of this measure is \$151 million over the 30 year period of analysis. In other words, utility customers will have \$151 million to spend elsewhere in the economy. In addition, more dollars will be spent in state on improving the energy efficiency of new residential buildings.

The economic impacts of energy efficiency in general (above and beyond this CASE initiative) are documented in several resources including the California Air Resources Board's (CARB) Updated Economic Analysis of California's Climate Change Scoping Plan, which compares the economic impacts of several scenario cases (CARB, 2010b). CARB include one case (Case 1) with a 33% renewable portfolio standard (RPS) and higher levels of energy efficiency compared to an alternative case (Case 4) with a 20% RPS and lower levels of energy efficiency. Gross state production (GSP)²⁴, personal income, and labor demand were between 0.6% and 1.1% higher in the case with the higher RPS and more energy efficiency (CARB 2010b, Table 26). While CARB's analysis does not report the benefits of energy efficiency and the RPS separately, we expect that the benefits of the package of measures are primarily due to energy efficiency. Energy efficiency measures are expected to reduce costs by \$2,133 million annually (CARB 2008, pC-117) whereas the RPS implementation is expected to cost \$1,782

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²³ Energy efficiency measures may result in reduced power plant construction, both in-state and out-of-state. These plants tend to be highly capital-intensive and often rely on equipment produced out of state, thus we expect that displaced power plant spending will be more than off-set from job growth in other sectors in California.

²⁴ GSP is the sum of all value added by industries within the state plus taxes on production and imports.

million annually, not including the benefits of GHG and air pollution reduction (CARB 2008, pC-130).

Macro-economic analysis of past energy efficiency programs and forward-looking analysis of energy efficiency policies and investments similarly show the benefits to California's economy of investments in energy efficiency (Roland-Holst 2008; UC Berkeley 2011).

3.5.1 Creation or Elimination of Jobs

CARB's economic analysis of higher levels of energy efficiency and 33% RPS implementation estimates that this scenario would result in a 1.1% increase in statewide labor demand in 2020 compared to 20% RPS and lower levels of energy efficiency (CARB 2010b, Tables 26 and 27). CARB's economic analysis also estimates a 1.3% increase in small business employment levels in 2020 (CARB 2010b, Table 32). The proposed CASE measure contributes energy savings and increases in labor demand associated with achieving the "higher levels of energy efficiency and RPS" scenario in CARB's analysis.

3.5.2 Creation or Elimination of Businesses within California

CARB's economic analysis of higher levels of energy efficiency and 33% RPS implementation (as described above) estimates that this scenario would result in 0.6% additional GSP in 2020 compared to 20% RPS and lower levels of energy efficiency (CARB 2010b, Table ES-2). We expect that higher GSP will drive additional business creation in California. In particular, local small businesses that spend a much larger proportion of revenue on energy than other businesses (CARB 2010b, Figures 13 and 14) should disproportionately benefit from lower energy costs due to energy efficiency standards. Increased labor demand, as noted earlier, is another indication of business creation.

Table 19 below shows California industries that are expected to receive the economic benefit of the proposed Title 24 code changes. It is anticipated that these industries will expand due to an increase in funding as a result of energy efficiency improvements. The list of industries is based on the industries that the University of California, Berkeley identified as being impacted by energy efficiency programs (UC Berkeley 2011 Table 3.8). This list provided below is an approximation of the industries that may receive benefit from the 2016 Title 24 code changes.

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Table 3.8 of the UC Berkeley report includes industries that will receive benefits of a wide variety of efficiency interventions, including Title 24 standards and efficiency programs. The authors of the UC Berkeley report did not know in 2011 which Title 24 measures would be considered for the 2016 adoption cycle, so the UC Berkeley report was likely conservative in their approximations of industries impacted by Title 24. Statewide CASE Team believes that industries impacted by utilities efficiency programs is a more realistic and reasonable proxy for industries potentially affected by upcoming Title 24 standards. Therefore, the table provided in this CASE Report includes the industries that are listed as benefiting from Title 24 and utility energy efficiency programs.

Table 19: Industries Receiving Energy Efficiency Related Investment, by North American Industry Classification System (NAICS) Code

Industry	NAICS Code
Residential Building Construction	2361
Roofing Contractors	238160
Electrical Contractors	23821
Plumbing, Heating, and Air-Conditioning Contractors	23822
Insulation Contractors	23831
Asphalt Paving, Roofing, and Saturated Materials	32412
Manufacturing	32412
Ventilation, Heating, Air-Conditioning, & Commercial Refrigeration Equip. Manf.	3334
Building Inspection Services	541350

3.5.3 Competitive Advantages or Disadvantages for Businesses within California

California businesses would benefit from an overall reduction in energy costs. This could help California businesses gain competitive advantage over businesses operating in other states or countries and an increase in investment in California, as noted below.

3.5.4 Increase or Decrease of Investments in the State of California

CARB's economic analysis indicate that higher levels of energy efficiency and 33% RPS will increase investment in California by about 3% in 2020 compared to 20% RPS and lower levels of energy efficiency (CARB 2010b Figures 7a and 10a). Overall, the proposed code change may bring forth further investment in the supply, distribution and sales channels of affected products. These include various types of roof deck insulation, ceiling insulation, drywall and air sealing products, certified low-leakage air handlers and sealed combustion furnaces.

3.5.5 Incentives for Innovation in Products, Materials, or Processes

Updating Title 24 standards will encourage innovation through the adoption of new technologies to better manage energy usage and achieve energy savings. The proposed DCS package will increase innovation both in terms of product as well as process. Increase in the envelope/HVAC energy performance requirement will drive innovation in insulation and HVAC system products, design practices and installation techniques. On the process level, the proposed codes changes will encourage enhanced coordination between trades in the field.

3.5.6 Effects on the State General Fund, State Special Funds and Local Governments

Higher property valuations due to energy efficiency enhancements may also result in positive local property tax revenues. The Statewide Statewide CASE Team has not obtained specific data to quantify potential revenue benefits for this measure.

3.5.6.1 Cost of Enforcement

Cost to the State

State government has budget for code development, education, and compliance enforcement. While state government will be allocating resources to update the Title 24 standards, including updating education and compliance materials and responding to questions about the revised standards, these activities are already covered by existing state budgets. The proposed code change does not require increased level of enforcement efforts and resources. Thus the costs to state government are small when compared to the overall costs savings and policy benefits associated with the code change proposals. Also, the proporsed requirements only impact residential new constructions, and will have no impact on the costs of state buildings.

Cost to Local Governments

All revisions to Title 24 will result in changes to Title 24 compliance determinations. Local governments will need to train permitting staff on the revised Title 24 standards. While this retraining is an expense to local governments, it is not a new cost associated with the 2016 code change cycle. The building code is updated on a triennial basis, and local governments plan and budget for retraining every time the code is updated. There are numerous resources available to local governments to support compliance training that can help mitigate the cost of retraining. As noted earlier, although retraining is a cost of the revised standards, Title 24 energy efficiency standards are expected to increase economic growth and income with positive impacts on local revenue.

This standard would revise an existing measure without significantly affecting the complexity of this measure. Therefore, on-going costs are not expected to change significantly.

3.5.6.2 Impacts on Specific Persons

The proposed changes to Title 24 are not expected to have a differential impact on any of the following groups relative to the state population as a whole:

- Migrant Workers
- Persons by age
- Persons by race
- Persons by religion
- Commuters

We expect that the proposed code changes for the 2016 Title 24 code change cycle would reduce energy costs and could put potential first-time homeowners in a better position to afford mortgage payments. On the other hand, homeowners may experience higher first costs to the extent that builders pass-through the increased costs of Title 24 compliance to home buyers. Some financial institutions have progressive policies that recognize that home buyers can

better afford energy efficiency homes (even with a higher first cost) due to lower energy costs ²⁶

Renters will typically benefit from lower energy bills if they pay energy bills directly. These savings should more than offset any capital costs passed-through from landlords. Renters who do not pay directly for energy costs may see more of less of the net savings based on how much landlords pass the energy cost savings on to renters.

On average, low-income families spend less on energy than higher income families, however lower income families spend a much larger portion of their incomes on energy (Roland-Holst 2008). Thus it seems reasonable that low-income families would disproportionately benefit from Title 24 standards that reduce residential energy costs.



²⁶ For example, see US EPA's Energy Star website for examples: http://www.energystar.gov/index.cfm?fuseaction=new homes partners.showStateResults&s code=CA.

4. METHODOLOGY

This section describes the methodology and approach the Statewide CASE Team used to estimate energy, demand, costs, and environmental impacts. The Statewide Statewide CASE Team calculated the impacts of the proposed code change by comparing existing conditions to the conditions if the proposed code change is adopted. This section of the CASE Report goes into more detail on the assumptions about the existing and proposed conditions, prototype buildings, and the methodology used to estimate energy, demand, cost, and environmental impacts.

4.1 Existing Conditions

To assess the energy, demand, costs, and environmental impacts, the Statewide CASE Team compared current design practices to design practices that would comply with the proposed requirements. There are existing Title 24 standards requirements for some of the proposed measures and compliance modeling assumptions for duct location as well as all of the HPA measures.

The Statewide CASE Team used baseline models that are minimally compliant with the 2013 Title 24 requirements. This means that HVAC distribution ducts are placed 100% in vented attics for single-story buildings, and 65%/35% split between conditioned space and vented attic for buildings with two or more stories. Ceiling insulation is installed on the attic floor with radiant barrier application. Details of these values are shown in Section 2.2. These duct and system location and insulation parameters largely reflect current market practice.

4.2 Proposed Conditions

The proposed conditions are defined as the design conditions that will comply with the proposed code change. Specifically, for DCS strategies the proposed code change will modify the distribution system default location within the compliance software.

For the HPA package, the proposed code changes will update the ceiling/roof insulation levels (and possibly assembly U-factor) requirement to reflect the addition of roof deck insulation. The requirement for radiant barrier will be removed for the baseline case with insulation below the roof deck because it does not make physical sense and is not practical to install radiant barrier below the below-deck insulation.

4.3 Prototype Building(s)

Table 20 presents the details of the prototype building(s) used in the analysis.

Table 21 presents details on pertinent parameters for the CASE topic, per the ACM reference manual.

Table 20: Prototype Buildings used for Energy, Demand, Cost, and Environmental Impacts Analysis

	Occupancy Type (Residential, Retail, Office, etc.)	Area (Square Feet)	Number of Stories	Relative Weight to Statewide Estimates	Other Notes
Prototype 1	Residential	2100	1	45%	Tile roof with 20% window area equally in all orientations
Prototype 2	Residential	2700	2	55%	Tile roof with 20% window area equally in all orientations

Table 21: Pertinent Parameters of Prototype Buildings

Component Description	Component Description			
	2100 sf , 1-story prototype	2700 sf, 2-story prototype		
Ceiling height	9	9		
Conditioned floor area (sf)	2100	2700		
Conditioned volume (ft ³)	18,900	25,750		
Gross Ceiling Area (sf)	2100	1450		

4.4 Climate Dependent

The impacts of the proposed two packages, DCS and HPA, are climate specific, and it is necessary to model energy savings for all 16 climate zones to illustrate the full range of impacts from using the two proposed packages.

4.5 Time Dependent Valuation

The TDV (Time Dependent Valuation) of savings is a normalized format for comparing electricity and natural gas savings that takes into account the cost of electricity and natural gas consumed during different times of the day and year. The TDV values are based on long term discounted costs (30 years for all residential measures and nonresidential envelope measures and 15 years for all other nonresidential measures). In this case, the period of analysis used is 30 years. The TDV cost impacts are presented in 2013 present value dollars. The TDV energy estimates are based on present-valued cost savings but are normalized in terms of "TDV kBTUs" so that the savings are evaluated in terms of energy units and measures with different periods of analysis can be combined into a single value.

This is a draft version of the CASE Report. The 2016 TDV values were not yet available when this draft report was being developed. The TDV energy and cost savings presented in this draft report were developed using 2013 TDV values. Despite what the table headings indicate, the

TDV energy and cost savings presented in this draft report were developed using 2013 TDV values and TDV cost saving are in 2011 dollars. The Statewide Statewide CASE Team will be submitting a revised version of this report in fall 2014, which will include the final recommended code change proposal and a updated TDV energy and cost savings results that use the 2016 TDV values.

The CEC derived the 2013 TDV values that were used in the analyses for this report (CEC 2011). The TDV energy impacts are presented in Section 5.1 of this report, and the statewide TDV cost impacts are presented in Section 5.2.

4.6 Energy Impacts Methodology

The Statewide Statewide CASE Team calculated per unit impacts and statewide impacts associated with all new construction, alterations, and additions during the first year buildings comply with the 2016 Title 24 Standards.

4.6.1 Per Unit Energy Impacts Methodology

The Statewide Statewide CASE Team estimated the electricity and natural gas savings associated with the proposed code change. The energy savings were calculated on a building basis.

Analysis Tools

The Statewide CASE Team utilized the latest available standard compliance software CBECC-Res version 605 and 611 to quantify energy savings and peak electricity demand reductions resulting from the proposed measure. The current compliance software to date can model all of the DCS options and all of the HPA measures.

Key Assumptions

CEC provided a number of key assumptions to be used in the energy impacts analysis (CEC 2011), in the CEC Life Cycle Cost Methodology Guidelines (LCC Methodology) including hours of operation, weather data, and prototype building design. Key runs and corresponding model parameter inputs for DCS and HPA strategies are presented in Table 22 and Table 23 respectively. Exceptions to the default compliance software assumptions are noted in the Notes column.

Table 22: Key assumptions for per unit Energy Impacts Analysis - DCS

Run	Parameter	Assumption	Source
DCS – verified ducts entirely in conditioned space	Duct location	No conduction loss, no duct leakage to outside	Default values in CBECC-Res

For the HPA measures, the Statewide CASE Team created runs first to assess the energy impacts from the proposed measures individually. The Statewide CASE Team then developed combinations runs consisting of multiple measures to determine the proposed prescriptive HPA package for climate zones.

Table 23: Key assumptions for per unit Energy Impacts Analysis - HPA

Run	Parameter	Assumption/Input	Source
HPA – roof deck insulation	Insulation location and level	Above-deck: R-8 Below-deck: R-13	Product availability and levels installed in Zero Energy Challenge Home/ test homes
HPA – ceiling insulation	Insulation level	R-38	Product availability and levels installed in Zero Energy Challenge Home/ test homes

4.6.2 Statewide Energy Impacts Methodology

First Year Statewide Impacts

The proposed code change apply to all low-rise new construction buildings in the affected climate zones. The Statewide Statewide CASE Team estimated statewide impacts for the first year buildings comply with the 2016 Title 24 Standards by multiplying per unit savings estimates by statewide construction forecasts.

4.7 Cost-effectiveness Methodology

This measure proposes two packages of requirements, corresponding to ducts in conditioned space (DCS) and high performance attics (HPA). Each package includes a combination of:

- Above or below roof deck insulation
- Ceiling insulation
- Duct location
- Air handler location

A lifecycle cost analysis is required to demonstrate that the measure is cost-effective over the 30 year period of analysis.

CEC's procedures for calculating lifecycle cost-effectiveness are documented in LCC Methodology (CEC 2011). The Statewide CASE Team followed these guidelines when developing the Cost-effectiveness Analysis for this measure. CEC's guidance dictated which costs were included in the analysis. Incremental equipment and maintenance costs over the 30 year period of analysis were included. The TDV energy cost savings from electricity and natural gas savings were considered. Each of these components is discussed in more detail below. In accordance with established procedures for LCC, the Statewide CASE Team has not included costs related to building or system design or any additional costs of verification by the builder/designers.

4.7.1 Incremental Cost Methodology

The Statewide CASE Team collected cost data for all of the components associated with each strategy and compiled costs to estimate an overall incremental project cost.

Cost data were collected from a variety of sources including:

- Published product reports and presentations
- Research reports and presentations
- Survey results from IOU ET projects
- Interviews with high performance building experts including HERS raters, energy consultants, builders, IOU residential new construction and emerging technology program managers, and building science experts.
- Retailers in California including 'big-box' retail chains such as Home Depot and Lowes.
- RS Means

Please see Appendix C: Cost Data Sources for a full list of data sources.

Overall, the Statewide CASE Team used best judgment with the data and qualitative input available to estimate incremental costs to implement the various strategies. The team assumed conservative estimates for incremental costs due to the variability and low number of data points. The incremental costs used in the analysis will likely be overestimates for actual implementation when the code takes effect in 2017. The Statewide CASE Team expects that not all builders will find all of the potential strategies cost-effective in all projects based on their practices, but there will be at least one strategy that will be cost-effective for a particular builder.

Both DCS and HPA strategies include a mix of additional construction and labor costs as well as material and labor savings. The strategies will likely result in temporary (short-term) increased labor costs for a learning curve while trades become better acquainted with implementing the design options.

Incremental Construction Cost Methodology

As requested by CEC, the Statewide CASE Team estimated the Current Incremental Construction Costs and Post-adoption Incremental Construction Costs. The Current Incremental Construction Cost (ΔCI_C) represents the cost of the incremental cost of the measure if a building meeting the proposed standard were built today. The Post-adoption Incremental Construction Cost (ΔCI_{PA}) represents the anticipated cost assuming full market penetration of the measure as a result of the new Standards, resulting in possible reduction in unit costs as manufacturing practices improve over time and with increased production volume of qualifying products the year the Standard becomes effective.

The Current Incremental Construction Cost is based on available cost data and qualitative input from several sources. The Statewide CASE Team considered both primary material and labor costs when determining the cost implications of the DCS and HPA strategies.

Material and labor costs were normalized to the 2100 and 2700 square foot CEC prototypes to compare cost points on the same scale. The best estimates for each component were selected based on the information available to provide a range of potential whole house incremental costs for each strategy.

DCS Strategies Costs

Incremental costs for DCS are presented in the results section (Section 5.2.1) in a <u>component based</u> method which provides estimates for total incremental costs based on the material and labor needed to employ each strategy. The incremental costs reflect 2014 material and labor costs reported by industry respondents and do not assume cost reductions that may occur once these practices become industry standard. As with all changes to construction practice, the building and manufacturing market will adjust and determine the best methods to achieve desired results. In addition to utilizing component costs data, the project team also collected <u>project level</u> costs to help anchor our cost results.

The Statewide CASE Team calculated incremental costs based on best estimates from the costs gathered on each component within a strategy. There are, however, interactive and building coordination implications that cannot be fully captured in a component based estimate. The Team determined incremental costs for both the single-story 2,100 square foot prototype and the 2-story 2,700 square foot prototype based on the 44%/55% statewide distribution of the two house sizes, consistent with the 2013 Title 24 Impact Analysis.

The incremental cost estimates for individual DCS components are limited in availability and accuracy due to general market inexperience. The team provides a range of costs based on the various cost data points that were available at the time of the analysis to illustrate this situation.

Table 24: Ranges for Incremental Construction Cost – DCS Dropped Ceiling

Dropped ceiling	2100 sf prototype	2700 sf prototype	Notes
Material costs (lumber, air barrier (OSB), drywall) + labor	\$560 - \$720	\$360 - \$460	
Sealed combustion furnace	\$210 - \$350	\$210 - \$350	Average among varying capacities; condensing furnaces represent higher end of costs.
Interior Mechanical Closet	\$220- \$390	\$220 - \$390	depends on location of closet (interior, attic, garage)
HERS Test for Verification of Duct Leakage to Outside	\$0-\$125	\$0-\$125	
Total Costs	\$990 - \$1,595	\$780 - \$1,325	Standard duct design
Weighted Total Cost	\$880 - \$1,447		Based on 44/55 prototype split

For DCS, the Statewide CASE Team attempted to get a total cost of implementation for each strategy in addition to the bottom-up approach (summing up individual component costs). However, because these strategies are not currently widely implemented we could collect very few overall cost data points. Over all builders, energy consultants and other building experts are not familiar with or well experienced in pricing out these strategies due to a lack of wide market presence. The data we did collect from surveys, interviews and published reports tends to be speculative and varies greatly due to the variability on building design and the respondent's level of familiarity with the strategies.

Using this method, it is difficult to accurately capture all the impacts and "soft" costs of construction beyond the direct material and labor needs. For this reason, the Team supplemented the component based costs with total incremental cost estimates from projects and builders using these strategies.

The Statewide CASE Team also considered "soft" costs when determining the cost implications of the strategies. "Soft" (or secondary) costs are generally hard to monetize and are project specific; these include items such as additional trips and adjusted schedules for trades, increased project oversight to ensure proper installation, and increased cycle time.

One major incremental cost *reduction* opportunity that the project team quantified, but did not include in the calculation of DCS costs is the potential to downsize HVAC equipment size and optimize supply duct runs. According to builder and industry expert interviewed, there exists substantial monetary savings for specifying smaller HVAC equipment when duct losses are eliminated by placing them in conditioned space. Although most other impacts will incur additional costs, some can be beneficial. For example, Lubliner (2008) notes that other trades such as electricians and plumbers can utilize open-web trusses for their conduit because this design provides easy access to spaces throughout the home, as long as it is planned accordingly with the duct runs. These soft cost considerations are listed in Table 25.

Table 25: Key "Soft" Cost Considerations for DCS

DCS Strategy	Assumptions of "Soft" Costs	Estimated impacts to cost
All DCS strategies	The potential to reduce HVAC equipment size and supply duct runs	Would reduce material and labor costs. Could result in cost savings of \$100 - \$400+ (Meritage 2014)
Dropped Ceiling	Quality air-sealing of dropped ceiling space	Quality air sealing of the dropped space will increase labor costs.
	Trades aware not to create penetrations through space	Increased project oversight and trade communication will be required to ensure trades are aware of restraints.

In the end, these cost savings and soft costs in general were NOT included in the cost-effectiveness analysis.

HPA Strategies Costs

The HPA component costs are generally more straightforward and cost data points are more obtainable and more accurate than the DCS data points; although, the responses still vary or are hard to obtain for some less common components such as raised heel trusses.

The Statewide CASE Team estimated component costs for HPA based on similar sources as the DCS strategies. Building experts, literature and retailers supplied cost data points that were used to establish per unit and total incremental costs. The team could not supplement these component based cost assumptions with project-specific examples because, unlike the DCS strategies, they are not whole building design alterations, but rather changes to individual pieces that add up to the total package. Several of the cost assumptions from builders and building experts are from field experience. However, to our knowledge, there are very few current construction within California implementing the proposed HPA package from which to leverage cost data.

Incremental Maintenance Cost Methodology

According to the LCC Methodology (CEC 2011), incremental maintenance costs should be included in the lifecycle cost analysis. Upon review, the Statewide Statewide CASE Team determined that there is no incremental maintenance costs associated with the proposed code change.

The maintenance requirements associated with the code change proposal, relative to existing conditions, are described qualitatively in Section 3.2.2 of this report.

4.7.2 Cost Savings Methodology

Energy Cost Savings Methodology

The PV of the energy savings were calculated using the method described in the LCC Methodology (CEC 2011). In short, the hourly energy savings estimates for the first year of building operation were multiplied by the 2013 TDV cost values to arrive at the PV of the cost savings over the period of analysis. The standard TDV cost values of \$xxx/TDV kBTU (TBD) was used to convert the energy savings into equivalent savings in 2014 dollars. The proposed two packages are weather sensitive, so the energy cost savings were calculated for each climate zone using climate zone specific TDV multipliers.

Other Cost Savings Methodology

As described previously in the subsection titled "DSC Soft Costs," implementation of either of the proposed packages could bring forth the additional cost savings from downsizing HVAC equipment. However, the project team did not include the cost savings into the Cost-effectiveness analysis reported in this report. This CASE topic does not have other non-energy cost savings.

4.7.3 Cost-effectiveness Methodology

The Statewide CASE Team calculated the cost-effectiveness using the LCC Methodology (CEC 2011. According to CEC's definitions, a measure is cost effective if it reduces overall lifecycle cost from the current base case (existing conditions). The LCC Methodology clarifies that absolute lifecycle cost of the proposed measure does not need to be calculated. Rather, it is necessary to calculate the change in lifecycle cost from the existing conditions to the proposed conditions.

If the change in lifecycle cost is negative then the measure is cost-effective, meaning that the present value of TDV energy savings is greater than the cost premium, or the proposed measure reduces the total lifecycle cost as compared to the existing conditions. Propane TDV costs are not used in the evaluation of energy efficiency measures.

The Planning Benefit to Cost (B/C) Ratio is another metric that can be used to evaluate cost-effectiveness. The B/C Ratio is calculated by dividing the total present value TDV energy cost savings (the benefit) by the present value of the total incremental cost (the cost). If the B/C

Ratio is greater than 1.0 (i.e. the present valued benefits are greater than the present valued costs over the period of analysis), then the measure is cost effective.

4.8 Environmental Impacts Methodology

4.8.1 Greenhouse Gas Emissions Impacts Methodology

Greenhouse Gas Emissions Impacts Methodology

The Statewide CASE Team calculated avoided GHG emissions assuming an emission factor of 353 metric tons of carbon dioxide equivalents (MTCO₂e) per GWh of electricity savings. As described in more detail in Appendix A, the electricity emission factor represents savings from avoided electricity generation and accounts for the GHG impacts if the state meets the Renewable Portfolio Standard (RPS) goal of 33 percent renewable electricity generation by 2020. Avoided GHG emissions from natural gas savings were calculated using an emission factor of 5,303 MTCO₂e/million therms (U.S. EPA 2011).

Greenhouse Gas Emissions Monetization Methodology

The 2013 TDV cost values include the monetary value of avoided GHG emissions, so the Cost-effectiveness Analysis presented in Section 5.2 of this report does include the cost savings from avoided GHG emissions. The monetization for the TDV values includes permit (retail) cost of avoided GHG emissions, but it does not include the social costs of avoided emissions. As evident in the results of the Cost-effectiveness Analysis, the value of avoided GHG emissions is aggregated into the total TDV cost savings and the contribution of GHG emissions is not easily discernible. To demonstrate the value of avoided GHG emissions, the Statewide Statewide CASE Team disaggregated the value of avoided GHG emissions from the overall TDV cost savings value. The Statewide Statewide CASE Team will use the same monetary values that are used in the TDV factors, which was not available at the tiem of writing. The next version of this report will include the monetary value of carbon.

4.8.2 Material Impacts Methodology (Optional)

The project team did not develop material impact estimate.

4.8.3 Other Impacts Methodology

The project team did not quantify or develop other non-energy impacts associated with the proposed packages.

5. Analysis and Results

Results from the energy, demand, cost, and environmental impacts analyses are presented in this section.

For both Ducts in Conditioned Space and High Performance Attics strategies, the project team derived cost-effectiveness results from

- Energy cost savings from modeled building-level energy savings and
- Incremental first costs from various retail, project and industry resources.

Both the DCS strategies and the proposed HPA package may be used to achieve TDV energy savings on the level of 13 % in comparison to the baseline that is minimally compliant to the 2013 Standards. Contrary to common perception, it does not necessarily cost more to implement DCS strategies than the combination of selective measures for HPA.

Since the proposed measures are consisted of a combination of building envelope and HVAC distribution system design changes, the energy performance implications are highly climate dependent. The savings potential are much higher in cooling dominant climate zones (such as CZ 13-15) than the milder climate zones (such as CZ 1, 3 and 5). For examples, a building in CZ 13 Fresno implementing an HPA package with R-13 below deck insulation will yield electric savings of 330 kWh. This is more than ten times the electric energy savings from implementing the same package in CZ 1 Arcata with 29 kWh. The differences in themrs savings are not as large as electric savings. Thought both CZ 13 and 1 both have gas savings when implementing the proposed HPA package, CZ 1, with 33 therms savings, yields twice the gas therm savings.

5.1.1 Per Unit Energy Impacts Results

Due to the complexity of the proposed DCS strategies and HPA measures, the project team performed energy simulation runs for individual measures as well as measure combinations. The results presented in this section focus on the DCS strategies and HPA measure combinations that perform the best in terms of energy savings and their cost-effectiveness. In "creating" the proposed HPA package, the project team also took into consideration the measures' physical compatibility with one another and feasibility of implementation.

Appendix D: Simulation Results Using CBECC-Res provides further details and discussions on savings results for individual DCS strategies and HPA measures. These results and discussions form the basis of our code proposal recommendations and provide explanations on nuances that are sometimes hard to detect between the wide variety of options to achieve DCS or HPA.

Per building energy and demand impacts of the proposed DCS and HPA measure are presented in Table 26 and Table 27 respectively. Weighted average per building savings for the first year are expected to be 194 kilowatt-hours per year (kWh/yr) and 13.8 therms/year. Demand savings will be presented in the next version of this report. The intention of proposing two parallel

packages with similar energy savings impact is to allow maximum flexibility in terms of design choices.

TDV electricity and natural gas savings combined over the 30 year period of analysis is estimated to be 13,650 kBTU combined. The TDV methodology allows peak electricity savings to be valued more than electricity savings during non-peak periods. Results shown in Table 26 is the per system results based on the 45%/55% mix of the 2100/2700sf building prototypes.

Table 26: Energy Impacts per Prototype Building - DCS Verified Ducts Entirely in Conditioned Space¹

	Per Un	Per Unit First Year TDV Savings ³		
Climate Zone	Electricity Savings ⁴ (kWh/yr)	Demand Savings (kW)	Natural Gas Savings (Therms/yr)	TDV Electricity and Gas Savings ⁵ (kBTU)
Climate Zone 1	54.5		63.4	12,338
Climate Zone 2	40.1		40.1	8,752
Climate Zone 3			7-	5,102
Climate Zone 4	56.2		34.6	9,211
Climate Zone 5				3,985
Climate Zone 6		,		4,000
Climate Zone 7	-			1,171
Climate Zone 8	66.8		8.6	6,500
Climate Zone 9	145.4		13.7	14,021
Climate Zone 10	189.9		16.1	14,589
Climate Zone 11	364.3		35.0	26,916
Climate Zone 12	131.9		47.2	18,148
Climate Zone 13	447.1		36.5	31,405
Climate Zone 14	359.2		36.5	25,697
Climate Zone 15	970.8		2.4	41,586
Climate Zone 16	120.3		91.5	21,416

^{1.} Per unit and per building savings for a DCS strategy are the same.

^{2.} Savings from one prototype building, for the first year the building is in operation.

^{3.} TDV energy savings for one prototype building. for the first year the building is in operation.

^{4.} Site electricity savings. Does not include TDV of electricity savings.

^{5.} Calculated using CEC's 2013 TDV factors and methodology.

Table 27: Energy Impacts per Prototype Building - HPA Package (with R-13 Below Roof Deck Insulation)¹

	Per Unit First Y			Per Unit First Year TDV Savings ³
Climate Zone	Electricity Savings ⁴ (kWh/yr)	Demand Savings (kW)	Natural Gas Savings (Therms/yr)	TDV Electricity and Gas Savings ⁵ (kBTU)
Climate Zone 1	28.5		33.2	6,527
Climate Zone 2	32.2		20.7	5,847
Climate Zone 3				
Climate Zone 4	46.2		17.6	6,147
Climate Zone 5				
Climate Zone 6				
Climate Zone 7				
Climate Zone 8	101.0		4.6	7,488
Climate Zone 9	165.8		6.5	12,568
Climate Zone 10	178.9		8.9	11,693
Climate Zone 11	265.4		12.5	17,087
Climate Zone 12	132.7		18.3	13,235
Climate Zone 13	330.7		15.0	20,249
Climate Zone 14	225.5		12.6	14,434
Climate Zone 15	611.1		2.2	26,589
Climate Zone 16	84.9		48.7	13,123

^{1. &}quot;Per unit" implies a combination of measures for the prototype building for the HPA package.

5.1.2 Statewide Energy Impacts Results

First Year Statewide Energy Impacts

The statewide energy impacts of the proposed measure package are presented in Table 28. During the first year buildings complying with the 2016 Title 24 Standards are in operation, the proposed measure is expected to reduce annual statewide electricity use by 17.6 GWh.

² Savings from one prototype building. for the first year the building is in operation.

^{3.} TDV energy savings for one prototype building, for the first year the building is in operation.

^{4.} Site electricity savings. Does not include TDV of electricity savings.

^{5.} Calculated using CEC's 2013 TDV factors and methodology.

Demand savings will be presented in the next verion of this report. Natural gas use is expected to be reduced by 1.26 MMtherms.

Table 28: Statewide Energy Impacts

	First Year Statewide Savings ¹			TDV Savings ²
	Electricity Savings ³ (GWh)	Power Demand Reduction (MW)	Natural Gas Savings (MMtherms)	TDV Electric and Gas Savings ⁴ (Million kBTU)
HPA – R-13 below deck	17.6	TBD	1.26	1,240
DCS – Verified Ducts in Conditioned Space	21.6	TBD	2.85	1,756

- First year savings from all buildings built statewide during the first year the 2016 Standards are in effect.
- First year TDV savings from all buildings built statewide during the first year the 2016 Standards are in effect.
- 3. Site electricity savings.
- 4. Calculated using CEC's 2013 TDV factors and methodology.

All assumptions and calculations used to derive per unit and statewide energy and demand savings are presented in Section 4.6 of this report.

5.2 Cost-effectiveness Results

5.2.1 Incremental Cost Results

HPA Package with R13 Below Roof Deck + R38 Ceiling Insulation

The incremental cost of the proposed measure, relative to existing conditions, is presented in Table 29. We show the results for both the single -story 2,100 square foot prototype and the 2-story 2,700 square foot prototype, as well as the average of the two based on the 44%/55% statewide distribution of the two house sizes consistent with the 2013 Title 24 Impact Analysis. The total incremental cost includes the incremental cost during initial construction only because the proposed measure does not incur incremental maintenance costs.

Table 29 shows the incremental costs for each HPA package component for R-13 below deck insulation, as well as the total incremental cost of the package. Note that the R-13 below deck insulation cost is based on using blow-in cellulose insulation type; it is the most economical way to achieve the below deck insulation value per our research. Each of these components cost item is discussed later in this section. Again, these costs do not include assumptions on increased "soft costs" such as trade coordination.

Table 29: Incremental Construction Cost – HPA

Parameter	2100 sf prototype	2700 sf prototype	Notes
Insulation at Roof Deck	\$1,058	\$730	R-13 blown-in cellulose + netting
Vapor Retarder	\$97	\$67	With Class II vapor retarder, for CZ 14, 16 only
Ceiling Insulation (increasing from R30 to R38)	\$292	\$201	For CZ 2-10 only since their 2013 prescriptive levels are R30
Eliminate Radiant Barrier	-\$348	-\$240	No radiant barrier with below deck insulation
Weighted Total Cost of R-13 below deck	\$589 (CZ 1, 11-13, 15) \$670 (CZ 14, 16) \$831 (CZ 2-10)		Based on 44/55 prototype split

The incremental costs in Table 29 were developed based on <u>per unit</u> incremental measure costs are provided in Table 30.

Table 30: Per unit Incremental Construction Cost - HPA

HPA components	\$/unit	Additional design	Additional training and coordination	Source
Below Deck Roof Insulation	\$0.26 ^a - \$2.05 ^b /s.f. roof Best est: \$0.29 ^c /s.f. roof		X	Online Retailers; Stakeholder Interview
Insulation Netting (blown-in)	\$0.13/s.f. roof			Online Retailers
Vapor Retarder (CZ 14, 16 with air permeable insulation)	\$0.04/s.f. roof			Online Retailers
TOTAL for Below Deck Insulation ^c	\$0.42/s.f. (CZ 1-13,15) \$0.46/s.f. (CZ 14, 16)			

^a Using R-11 blown-in cellulose

DCS Package with HERS Verification of Duct Leakage to Outdoors

Table 31 shows the incremental costs for implementing the Verified DCS vented attic – dropped ceiling strategy for both prototypes and their weighted average. These costs were calculated based on best estimates for the components involved in each strategy. The range of cost estimates represents the low and high values received from various sources. Again, the Statewide CASE Team did not include "soft costs" (either benefits or hinderance) in our calculation of incremental costs.

^b Using R-12 cc-SPF

^c Using R-13 blown-in cellulose

Table 31: Incremental Construction Cost – Verified DCS – Dropped Ceiling

Dropped ceiling	2100 sf prototype	2700 sf prototype	Notes
Material costs (lumber, air barrier (OSB), drywall) + labor	\$557 (\$249 + \$308)	\$357 (\$159 + \$197)	
Sealed combustion furnace	\$201	\$201	Average among varying capacities; condensing furnaces represent higher end of costs.
Interior Mechanical Closet	\$216	\$216	location of closet in garage corner
HERS Test for Verification of Duct Leakage to Outside	\$125	\$125	
Total Costs	\$1099	\$899	With standard duct design
Weighted Total Cost	\$990		Based on 44/55 prototype split

The incremental costs in Table 31 were developed based on the <u>per unit</u> incremental costs for the DCS dropped ceiling strategy are provided in Table 32.

Table 32: Key Assumptions for per unit Incremental Construction Cost – DCS: Dropped Ceiling

Parameter	Assumption	Source	Notes
Material costs (lumber, air barrier (OSB), drywall) + labor	\$1.18 - \$2.65/s.f. dropped ceiling	Online retail; RS Means labor	Includes labor
Sealed Combustion Equipment	\$210 - \$360/furnace	Online Retailer	Incremental cost depends on condensing capabilities and equipment capacity.
			Located in attic, consists of 4 newly constructed walls; located in garage, consists of 2 newly constructed walls adjacent to conditioned space.
Mechanical Closet	\$3.80/s.f. closet walls	Online retailer	Includes framining, insulation and drywall/OSB finishing
HERS Test for Verification of Duct Leakage to Outside	\$125	Calls with HERS Raters	Standards already require HERS test for duct leakage. The added cost here is to conduct a blower door at the same time to estimate leakage to outside from ducts.

Incremental Maintenance Cost Results

There are no incremental maintenance costs associated with the proposed measures compared to current construction standards. As long as components are installed per manufacturer

instructions, there should not be additional maintenance than currently required to maintain roof and HVAC systems. Maintenance requirements associated with the code change proposal, relative to existing conditions, are described qualitatively in Section 3.3 of this report.

5.2.2 Energy Cost Savings Results

The per unit TDV energy cost savings over the 30 year period of analysis are presented in Table 33 for the HPA package with R13 insulation below roof deck. While the proposed measure would results in cost savings in every climate zone, the Team has only included and displayed the cost savings for climate zones where the measure is determined to be cost effective.

As noted, this is a draft version of the CASE Report. The 2016 TDV values were not yet available when this draft report was being developed. The TDV energy and cost savings presented in this draft report were developed using 2013 TDV values and TDV cost saving are in 2011 dollars. The Statewide Statewide CASE Team will be submitting a revised version of this report in fall 2014, which will include the final recommended code change proposal and a updated TDV energy and cost savings results that use the 2016 TDV values.

Table 33: TDV Energy Cost Savings Over 30 Year Period of Analysis - Per Unit

Climate Zone	TDV Electricity and Gas Cost Savings (2013 PV \$)
Climate Zone 1	\$1,129
Climate Zone 2	\$1,011
Climate Zone 3	-
Climate Zone 4	\$1,063
Climate Zone 5	1
Climate Zone 6	-
Climate Zone 7	-
Climate Zone 8	\$1,295
Climate Zone 9	\$2,174
Climate Zone 10	\$2,023
Climate Zone 11	\$2,956
Climate Zone 12	\$2,290
Climate Zone 13	\$3,503
Climate Zone 14	\$2,497
Climate Zone 15	\$4,600
Climate Zone 16	\$2,270

Given data regarding the new construction forecast for 2017, the Statewide CASE Team estimates that TDV energy cost savings (30 year) of all buildings built during the first year the 2016 Standards are in effect will be \$151 million.

5.2.3 Cost-effectiveness Results

Results per unit lifecycle Cost-effectiveness Analyses are presented in Table 34 <u>for the HPA</u> <u>package with R13 insulation below roof deck</u>. The proposed measure is cost-effective in climate zones 1-2, 4, and 8 through 16.

Table 34: Cost-effectiveness Summary¹

Climate Zone	Benefit: TDV Energy Cost Savings + Other Cost Savings ² (2013 PV\$)	Cost: Total Incremental Cost ³ (2013 PV\$)	Change in Lifecycle Cost ⁴ (2013 PV\$)	Benefit to Cost Ratio ⁵
Climate Zone 1	\$1,129	\$ 589	\$ (540)	1.9
Climate Zone 2	\$1,011	\$ 831	\$ (180)	1.2
Climate Zone 3	\$478	\$ 831	\$ 353	0.6
Climate Zone 4	\$1,063	\$ 831	\$ (232)	1.3
Climate Zone 5	\$421	\$ 831	\$ 410	0.5
Climate Zone 6	\$518	\$ 831	\$ 314	0.6
Climate Zone 7	\$198	\$ 831	\$ 633	0.2
Climate Zone 8	\$1,295	\$ 831	\$ (464)	1.6
Climate Zone 9	\$2,174	\$ 831	\$ (1,343)	2.6
Climate Zone 10	\$2,023	\$ 831	\$ (1,192)	2.4
Climate Zone 11	\$2,956	\$ 589	\$ (2,367)	5.0
Climate Zone 12	\$2,290	\$ 589	\$ (1,701)	3.9
Climate Zone 13	\$3,503	\$ 589	\$ (2,914)	5.9
Climate Zone 14	\$2,497	\$ 670	\$ (1,828)	3.7
Climate Zone 15	\$4,600	\$ 589	\$ (4,011)	7.8
Climate Zone 16	\$2,270	\$ 670	\$ (1,601)	3.4

^{1.} Relative to existing conditions. All cost values presented in 2013 dollars.

Present value of TDV cost savings equals TDV electricity savings plus TDV natural gas savings; ΔTDV\$ = ΔTDV\$E + ΔTDV\$G.

Total incremental cost equals incremental construction cost (post adoption) plus present value of incremental maintenance cost; $\Delta C = \Delta C I_{PA} + \Delta C M$.

Negative values indicate the measure is cost-effective. Change in lifecycle cost equals cost premium minus TDV energy cost savings; $\Delta LCC = \Delta C - \Delta TDV$ \$

The benefit to cost ratio is the TDV energy costs savings divided by the total incremental costs; $B/C = \Delta TDV$ \$ ÷ ΔC . The measure is cost effective if the B/C ratio is greater than 1.0.

Given data regarding the new construction forecast for 2017, the Statewide Statewide CASE Team estimates that that lifecycle cost savings (30 year) of all buildings built during the first year the 2016 Standards are in effect will be \$ 151 million.

5.3 Environmental Impacts Results

5.3.1 Cost Savings Results

Other Cost Savings Results

This measure does not have any non-energy cost savings.

5.3.2 Greenhouse Gas Emissions Results

Table 35 presents the estimated first year avoided GHG emissions of the proposed code change. During the first year the 2016 Standards are in effect the proposed measure will result in avoided GHG emissions of 12,900 MTCO₂e. The monetary value of avoiced carbon emissions will be prestend in the next version of this report. The monetary value of avoided GHG emissions is included in TDV cost factors (TDV \$) for each hour of the year and thus included in the Cost-effectiveness Analysis presented in this report.

Table 35: Statewide Greenhouse Gas Emissions Impacts

	First Yea	ar Statewide
	Avoided GHG Emissions ¹ (MTCO ₂ e/yr)	Monetary Value of Avoided GHG Emissions ² (\$2013)
HPA – R-13 below deck	12,900	TBD
DCS – Verified Ducts in Conditioned Space	22,760	TBD

First year savings from buildings built in 2017; assumes 353 MTCO₂e/GWh and 5,303 MTCO₂e/MMTherms.

5.3.3 Water Use and Water Quality Impacts

Impacts on water use and water quality are presented in Table 36.

The proposed measure does not impact water consumption or water quality.

^{2.} Monetary value of carbon is included in cost effectiveness analysis; assumes TBD\$/ MTCO₂e.

Table 36: Impacts of Water Use and Water Quality

	On-Site Water Savings ¹ (gallons/yr)	Embedded Energy Savings ² (kWh/yr)	Impact on Water Quality Material Increase (I), Decrease (D), or No Change (NC) compared to existing conditions				
			Mineralization (calcium, boron, and salts)	Algae or Bacterial Buildup	Corrosives as a Result of PH Change	Others	
Impact (I, D, or NC)	NC	N/A	N/A	N/A	N/A	N/A	
Per Unit Impacts	NC	N/A	N/A	N/A	N/A	N/A	
Statewide Impacts (first year)	NC	N/A	N/A	N/A	N/A	N/A	
Comment on reasons for your impact assessment	NC	N/A	N/A	N/A	N/A	N/A	

^{1.} Does not include water savings at power plant

5.3.4 Material Impacts Results (Optional)

The impacts of the proposed code change on material use were not evaluated.

Table 37: Impacts of Material Use

	Impact on Material Use Material Increase (I), Decrease (D), or No Change (NC) compared to base case (lbs/year)									
	Mercury	Lead	Copper	Steel	Plastic	Others (Identify)				
Impact (I, D, or NC)	NC	NC	NC	NC	NC	NC				
Per Unit Impacts	N/A	N/A	N/A	N/A	N/A	N/A				
Statewide Impacts (first year)	N/A	N/A	N/A	N/A	N/A	N/A				

5.3.5 Other Impacts Results

Other forms of impacts of the proposed code change were not evaluated.

^{2.} Assumes embedded energy factor of 10,045 kWh per million gallons of water.

6. PROPOSED LANGUAGE

The proposed changes to the Standards, Reference Appendices, and the ACM Reference Manuals are provided below. Changes to the 2013 documents are marked with <u>underlining</u> (new language) and <u>strikethroughs</u> (deletions).

6.1 Standards

SECTION 150.1 Performance and Prescriptive Compliance Approaches for Newly Constructed Residential Buildings

- (c) **Prescriptive Standards/Component Package.** Buildings that comply with the prescriptive standards shall be designed, constructed, and equipped to meet all of the requirements for the appropriate climate zone shown in TABLE 150.1-A. In TABLE 150.1-A, a NA (not allowed) means that feature is not permitted in a particular climate zone and a NR (no requirement) means that there is no prescriptive requirement for that feature in a particular climate zone. Installed components shall meet the following requirements:
 - 9. Space conditioning ducts distribution systems. All ducts shall either be in directly conditioned space as confirmed by field verification and diagnostic testing in accordance with Reference Residential Appendix RA3.1.4.3.8 or be insulated to a minimum installed level as specified by TABLE 150.1-A. All ducts shall meet all applicable mandatory requirements of Section 150.0(m). All space conditioning systems shall reduce distribution losses by complying with items A or B below:

NOTE: Requirements for duct insulation in TABLE 150.1-A do not apply to buildings with space conditioning systems that do not have ducts.

- **A.** <u>High performance attics.</u> Air handlers or ducts are allowed to be in unconditioned spaces or vented attic spaces when the roof/attic/ceiling and duct insulation levels meet the requirements shown in TABLE 150.1-A.
- **B.** Duct and air handlers in conditioned space. Duct work and air handlers of HVAC systems shall be in conditioned space. Complying systems include either item i or ii.
 - i. HVAC systems where air handlers and all duct work are in conditioned spaces. If the air handler contains a combustion component it shall be Direct-Vent²⁷, taking no combustion air from the conditioned space. All ducts shall be in directly conditioned space as confirmed by field verification and

²⁷ Using the term "Direct-Vent" to be consistent with the IMC and CMC. The 2013 California Mechanical Code (Part 4) Chapter 2 Definitions has the following definition: **Direct-Vent Appliances**. Appliaces that are constructed and installed so that air from combustion is derived directly from the outdoors and flue gases are discharged to the outdoors. [NFPA 54:3.3.6.3]

diagnostic testing in accordance with Reference Residential Appendix RA3.1.4.3.8. All ducts shall meet all applicable mandatory requirements of Section 150.0(m).

ii. <u>Ductless HVAC systems including but not limited to: ductless mini-split systems, hydronic heating and cooling systems, packaged terminal heat pumps, packaged terminal air conditioners with hydronic heating or sealed gas heating, and sealed combustion wall furnaces.</u>



TABLE 150.1-A COMPONENT PACKAGE-A Standard Building Design

TA	TABLE 150.1-A COMPONENT PACKAGE-A Standard Building Design																			
												Climate								
	1 1			1	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
			Option A (meets §150.1(c)9A)	Below Roof Deck Insulation	<u>R13</u>	<u>R13</u>	<u>NA</u>	<u>R13</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>R13</u>								
		Roofs /Ceiling		Ceiling Insulation	<u>R 38</u>	<u>R 38</u>	<u>R 30</u>	<u>R 38</u>	<u>R 30</u>	<u>R 30</u>	<u>R 30</u>	<u>R 38</u>								
				Radiant Barrier	<u>NR</u>	<u>NR</u>	<u>REQ</u>	<u>NR</u>	REQ	REQ	REQ	<u>NR</u>								
			Option B (meets §150.1(c)9B)	Ceiling Insulation	U 0.025 R 38	U 0.031 R 30	U 0.031 R 30	U 0.031 R 30	U 0.031 R 30	U 0.031 R 30	U 0.031 R 30	U 0.031 R 30	U 0.031 R 30	U 0.031 R 30	U 0.025 R 38	U 0.025 R 38				
90.			Opt (meets §1	Radiant Barrier	<u>NR</u>	REQ	REQ	REQ	REQ	<u>REQ</u>	REQ	REQ	REQ	REQ	REQ	REQ	REQ	<u>REQ</u>	REQ	<u>NR</u>
Building Envelope	Insulation ¹	Walls	rade	2x4 Framed ²	U 0.065 R 15+4 or R 13+5	U 0.065 R 15+4 or R 13+5	U 0.065 R15+4 or R 13+5	U 0.065 R 15+4 or R 13+5	U 0.065 R 15+4 or R 13+5	U 0.065 R 15+4 or R 13+5	U 0.065 R 15+4 or R13+5	U 0.065 R 15+4 or R 13+5	U=0.065 R 15+4 or R 13+5	U 0.065 R 15+4 or R 13+5	U 0.065 R 15+4 or R 13+5	U 0.065 R 15+4 or R 13+5	U 0.065 R 15+4 or R 13+5			
			Above Grade	Mass Wall Interior ³	U 0.070 R 13	U 0.070 R 13	U 0.070 R 13	U 0.070 R 13	U 0.070 R 13	U 0.070 R 13	U 0.070 R 13	U 0.070 R 13	U0.070 R 13	U0.070 R 13	U0.070 R 13	U0.070 R 13	U0.070 R 13	U0.070 R 13	U0.070 R 13	U 0.059 R 17
				Mass Wall Exterior ³	U 0.125 R 8.0	U 0.125 R 8.	U 0.125 R 8.0	U 0.125 R 8.0	U 0.125 R 8.0	U 0.125 R 8.0	U 0.125 R 8.0	U 0.125 R 8.0	U 0.125 R 8.0	U 0.125 R 8.0	U 0.125 R 8.0	U 0.125 R 8.0	U 0.125 R 8.0	U 0.1025 R 8.0	U 0.125 R 8.0	U 0.070 R 13

		Below Grade Exterior ³	U₌0.200 R 5.0	U 0.200 R 5.0	U 0.100 R 10	U 0.100 R 10	U 0.053 R 19											
		Slab Perimeter	NR	U 0.58 R 7.0														
	Floors	Raised	U 0.037 R 19	U 0.037 R 19														
		Concrete Raised	U 0.092 R 8.0	U 0.092 R 8.0	U 0.269 R 0	U 0.269 R 0	U0.269 R 0	U 0.269 R 0	U 0.269 R 0	U 0.269 R 0	U 0.269 R 0	U 0.269 R 0	U 0.092 R 8.0	U 0.138 = 4.0	U 0.092 R 8.0	U 0.092 R 8.0	U 0.138 R 4.0	U 0.092 R 8.0
Radiant Barrier		arrier	NR	<u>NR</u>	REQ	<u>NR</u>	REQ	REQ	REQ	<u>NR</u>	<u>NR</u>	<u>NR</u>	<u>NR</u>	NR.	<u>NR</u>	NR	<u>NR</u>	NR
cts	Ill	Aged Solar Reflectance	NR	0.6	NR	0.6	NR											
Products	Low-sloped	Thermal Emittance	NR	0.75	NR	0.75	NR											
Roofing 1	Steep Sloped	Aged Solar Reflectance	NR	0.20	0.20	0.20	0.20	0.20	0.20	NR								
Roc		Thermal Emittance	NR	0. 75	0.75	0.75	0.75	0.75	0.75	NR								
u(Maximun	ı U-factor ⁴	0.32	0.32	0.32	0.32	0.32	0.32	0.32	0.32	0.32	0.32	0.32	0.32	0.32	0.32	0.32	0.32
enestration	Maximu	m SHGC ⁵	NR	0.25	NR	0.25	NR	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25
enest	Maximum	Total Area	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%
Fe	Maximum We	est Facing Area	NR	5%	NR	5%	NR	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%

TABLE 150.1-A COMPONENT PACKAGE-A Standard Building Design (continuation)

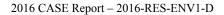


TABLE 150.1-A COMPONENT PACKAGE-A Standard Building Design (continuation)

				Climate Zone															
				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	ting	Electric Allowed	e-Resistance l	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No
	Space Heating	If gas, A	AFUE	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN
	Spac	If Heat Pump, HSPF ⁶		MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN
		SEER		MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN	MIN
	Space cooling	Refriger Charge Verifica Charge Display	ation or Indicator	NR	REQ	NR	NR	NR	NR	NR	REQ	NR							
		Whole House Fan ⁷		NR	NR	NR	NR	NR	NR	NR	REQ	NR	NR						
HVACSYSTEM	Central System Air Handlers ⁸	Central Integra Ventilat Fan Eff	ted tion System	REQ	REQ	REQ	REQ	REQ	REQ	REQ	REQ	REQ	REQ	REQ	REQ	REQ	REQ	REQ	REQ
	1	Duct Insulation		R-6	R-6	R-6	R-6	R-6	R-6	R-6	R-6	R-6	R-6	R-8	R-6	R-6	R-8	R-8	R-8
	Ducts	Handler d Space	Option A (meets §150.1(c)9A)	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
	Q	Duct and Air Handler in Conditiond Space	Option B (meets §150.1(c)9B)	REQ ⁹	REQ9	REQ ⁹	REQ9	REQ ⁹											

Footnote requirements to TABLE 150.1-A:

- 1. The U-factors/R-values shown for ceiling, wall and raised floor insulation are for wood-frame construction with insulation installed between the framing members. For alternative construction assemblies, see Section 150.1(c)1A, B and C.
- 2. U-factors can be met by cavity insulation alone or with continuous insulation alone, or with both cavity and continuous insulation that results in a U-factor equal to or less than the U-factor shown. "R-15+4" means R-15 cavity insulation plus R-4 continuous insulation sheathing. Any combination of cavity insulation and/or continuous insulation that results in a U-factor equal to or less than 0.065 is allowed, such as R-13+5.
- 3. Mass wall has a thermal heat capacity greater than or equal to 7.0 Btu/h-ft2. Below grade "interior" denotes insulation installed on the inside surface of the wall. Below grade "exterior" denotes insulation installed on the outside surface of the wall.
- 4. The installed fenestration products shall meet the requirements of Section 150.1(c)3.
- 5. The installed fenestration products shall meet the requirements of Section 150.1(c)4.
- 6. HSPF means "heating seasonal performance factor."
- 7. When whole house fans are required (REQ), only those whole house fans that are listed in the Appliance Efficiency Directory may be installed. Compliance requires installation of one or more WHFs whose total airflow CFM is capable of meeting or exceeding a minimum 2 cfm/square foot of conditioned floor area per Section 150.1(c)12.
- 8. A supplemental heating unit may be installed in a space served directly or indirectly by a primary heating system, provided that the unit thermal capacity does not exceed 2 kilowatts or 7,000 Btu/hr and is controlled by a time limiting device not exceeding 30 minutes.
- 9. For duct and air handler location: REQ denotes location in conditioned space. When the table indicates ducts and air handlers are in conditioned space, a HERS verification is required per Reference Residential Appendix RA3.1.4.3.8



6.2 Reference Appendices

Currently the compliance software recognizes variables of terms/options for installing ducts in conditions space, including

- Ducts entirely in conditioned space
- Verified low leakage ducts entirely in conditioned space
- Ducts in conditioned space except for 12 linear feet
- Ducts located in various locations

Modifications will be made in the Residential Appendix to field testing procedure requirements and protocols associated with each of the allowable DCS approaches and the HPA package.

Modifications will be made in the Residential Appendix to field testing procedure requirements and protocols associated with each of the DCS approaches and the HPA package. The proposed code change will modify Residential Appendices RA2 for HERS verification, testing and documentation procedures, RA3 for residential field verification and diagnostic test protocols, and RA4 for eligibility criteria for energy efficiency measures. The proposal will update Table RA2-1 Summary of Measures Requiring Field Verification and Diagnostic.

The proposed measure will require updates, deletion and consolidations to the following subsections of RA3 for verification of installing ducts in conditioned space and quality insulation installation:

- 3.1 Field Verification and Diagnostic Testing of <u>Air Distribution Systems</u>
 Table RA3.1.2 Duct Leakage Verification and Diagnostic Test
 Protocols and Compliance Criteria
 - 3.1.4 Verification and Diagnostic Procedures
 - 3.1.4.1 Diagnostic Supply Duct Location, Surface Area and R-value²⁸
 - 3.1.4.1.1 Verified Duct System Design:
 - 3.1.4.1.2 Verification of 12 Linear Feet or Less of Duct Located Outside Of Conditioned Space²⁹
 - 3.1.4.1.2 Verification of Ducts Located In Conditioned Space
 - 3.1.4.1.4 Verification of Supply Duct Surface Area Reduction
 - 3.1.4.3.8 Verification of Low Leakage Ducts in Conditioned Space Compliance Credit
 - 3.1.4.3.9 Verification of Low Leakage Air-Handling Unit with Sealed and Tested Duct System
- 3.5 Quality Insulation Installation Procedures

²⁸ This proposal will add requirements for air handler location within conditioned space

²⁹ This compliance option is proposed to be removed

3.5.1 Purpose and Scope

- 3.5.3.3 Roof/Ceilings (Batt and Blanket)
 - 3.5.3.3.1 Special Situation Enclosed Rafter Ceilings
 - 3.5.3.3.2 Special Situations Attics and Cathedral Ceilings
- 3.5.4.3 Roof/Ceilings (Loose Fill)
- 3.5.5.3 Roof/Ceilings (Rigid Foam Board)
- 3.5.6.3 Roof/Ceilings (SPF)
 - 3.5.6.3.2 Special Situations Attics and Cathedral Ceilings

The proposed measure will require minor modification to RA4 Eligibility Criteria for Energy Efficiency Measures:

- 4.2 Building Envelope Measures
 - 4.2 Radiant Barrier
 - 4.2.1.1 For Prescriptive Compliance: The attic shall be ventilated

Appendix RA2 – Residential HERS Verification, Testing, and Documentation Procedures

Measure Title	Description	Procedure
	Duct Measures	RA3.1.4.3
Duct Sealing	Component Packages require that space conditioning ducts be sealed. If sealed and tested ducts are claimed for compliance, field verification and diagnostic testing is required to verify that approved duct system materials are utilized, and that duct leakage meets the specified criteria.	RA3.1.4.1
Supply Duct Location, Surface Area and R- value	Compliance credit can be taken for improved supply duct location, surface area and R-value. Field verification is required to verify that the duct system was installed according to the design, including location, size and length of ducts, duct insulation R-value and installation of buried ducts. For buried ducts measures, Duct Sealing and High Quality Insulation Installation (QII) is required.	RA3.1.4.3.8
Verification of ducts located entirely in directly conditioned space, and Low Leakage Ducts in Conditioned Space	When the Standards specify use of the procedures in Section RA3.1.4.3.8 to determine if space conditioning system ducts are located entirely in directly conditioned space, the duct system location shall be verified by diagnostic testing. Compliance credit can be taken if option A is used per Section 150.1(c).9.A of the Standards for verified duct systems with low air leakage to the outside when measured in accordance with Reference Residential Appendix Section RA3.1.4.3.8. Field Verification for ducts in conditioned space is required. Duct sealing is required.	RA3.1.4.3.9
Low Leakage Air-handling Units	Compliance credit can be taken for installation of a factory sealed air handling unit tested by the manufacturer and certified to the Commission to have met the requirements for a Low Leakage Air-Handling Unit. Field verification of the air handler's model number is required. Duct Sealing is required.	RA3.1.4.4
Verification of Return Duct Design	Verification to confirm that the return duct design conform to the criteria given in TABLE 150.0-C or TABLE 150.0-D	RA3.1.4.5
Verification of Air Filter Device Design	Verification to confirm that the air filter devices conform to the requirements given in Standards Section 150.0(m)12.	RA3.1.4.6

Verification of Prescriptive Bypass Duct Requirements	Verification to confirm zonally controlled systems comply with the bypass duct requirements in Section 150.1(c)13	
Measure Title	Description	Procedure
	Building Envelope Measures	
Building Envelope Air Leakage	Compliance credit can be taken for reduced building envelope air leakage. Field verification and diagnostic testing is required.	RA3.8
High Quality Insulation Installation (QII)	Compliance Software recognizes standard and improved envelope construction. Compliance credit can be taken for quality installation of insulation. Field verification is required.	RA3.5
Quality Insulation Installation for Spray Polyurethane Foam (SPF) Insulation	A HERS Rater shall verify the installation of SPF insulation whenever R-values other than the default R-value per inch are used for compliance.	RA3.5.6

Appendix RA3 – Residential Field Verification and Diagnostic Test Protocols

RA3.1.4 Verification and Diagnostic Procedures

This section describes the procedures used to verify compliance with the mandatory and performance compliance requirements for air distribution systems.

RA3.1.4.1.2 Verification of 12 Linear Feet or Less of Duct Located Outside Of Conditioned Space

A visual inspection shall confirm space conditioning systems with air handlers located outside the conditioned space have 12 linear feet or less of duct located outside the conditioned space including air handler and plenum. If the space conditioning system has more than 12 feet of duct outside of conditioned space, the system does not pass.

RA3.1.4.3.8 Verification of Low Leakage Ducts in Conditioned Space Compliance Credit, and Ducts Located Entirely In Directly Conditioned Space

When ducts are located in conditioned space, additional performance compliance credit is available for low leakage ducts. if duct leakage to outside is equal to or less than 25 cfm when measured in accordance with Section RA3.1.4.3.4, the system passes. The dwelling must also be qualified to receive the credit for verified ducts in conditioned space as verified by visual inspection according to Section RA3.1.4.1.3.

When the Standards specify use of the procedures in Section RA3.1.4.3.8 to determine if space conditioning system ducts are located entirely in directly conditioned space, the duct system location

shall be verified by diagnostic testing according to the following criterion: If duct leakage to outside is equal to or less than 25 cfm when measured in accordance with Section RA3.1.4.3.4, the system ducts shall be considered to be located entirely in directly conditioned space. Duct systems that do not meet this criterion shall not be considered to be located entirely in directly conditioned space.

RA3.1.4.3.9 Verification of Low Leakage Air-Handling Unit with Sealed and Tested Duct System

An additional performance compliance credit is available for verified low leakage ducts if a qualified low leakage air-handling unit is installed. The low leakage air-handling unit cabinet (furnace, or heat pump fan and inside coil) shall conform to the qualification requirements given in Reference Joint Appendix JA9, and shall be included in the list of low leakage air handling units published by the Energy Commission. The qualified air handler must be connected to a sealed and tested new duct system to receive the credit.

In order to comply with this credit, the duct system shall be verified to leak less than or equal to the leakage rate specified on the Certificate of Compliance using the methods in Section RA3.1.4.3.1, and the air handler manufacturer make and model number shall be verified to be a model certified to the Energy Commission as qualified for credit as a low leakage air handler.

6.3 ACM Reference Manual

This section will be updated in the Final CASE report.

6.4 Compliance Manuals

This section will be updated in the Final CASE report.

6.5 Compliance Forms

This section will be updated in the Final CASE report.

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8. APPENDIX A: ENVIRONMENTAL IMPACTS METHODOLOGY

Greenhouse Gas Emissions Impacts Methodology

The avoided GHG emissions were calculated assuming an emission factor of 353 metric tons of carbon dioxide equivalents (MTCO₂e) per GWh of electricity savings. The Statewide Statewide CASE Team calculated air quality impacts associated with the electricity savings from the proposed measure using emission factors that indicate emissions per GWh of electricity generated. When evaluating the impact of increasing the Renewable Portfolio Standard (RPS) from 20 percent renewables by 2020 to 33 percent renewables by 2020, California Air Resources Board (CARB) published data on expected air pollution emissions for various future electricity generation scenarios (CARB 2010). The Statewide Statewide CASE Team used data from CARB's analysis to inform the air quality analysis presented in this report.

The GHG emissions factor is a projection for 2020 assuming the state will meet the 33 percent RPS goal. CARB calculated the emissions for two scenarios: (1) a high load scenario in which load continues at the same rate; and (2) a low load rate that assumes the state will successfully implement energy efficiency strategies outlined in the AB32 scoping plan thereby reducing overall electricity load in the state.

To be conservative, the Statewide Statewide CASE Team calculated the emissions factors of the incremental electricity between the low and high load scenarios. These emission factors are intended to provide a benchmark of emission reductions attributable to energy efficiency measures that could help achieve the low load scenario. The incremental emissions were calculated by dividing the difference between California emissions in the high and low generation forecasts by the difference between total electricity generated in those two scenarios. While emission rates may change over time, 2020 was considered a representative year for this measure.

Avoided GHG emissions from natural gas savings were calculated using an emission factor of 5,303 MTCO₂e/million therms (U.S. EPA 2011).

Greenhouse Gas Emissions Monetization Methodology

The 2013 TDV cost values used in the LCC Methodology includes the monetary value of avoided GHG emissions based on a proxy for permit costs (not social costs) and the Cost-effectiveness Analysis presented in Section 5.2 of this report does include the cost savings from avoided GHG emissions. To demonstrate the cost savings of avoided GHG emissions, the

³⁰ California power plants are subject to a GHG cap and trade program and linked offset programs until 2020 and potentially beyond.

Statewide Statewide CASE Team disaggregated value of avoided GHG emissions from the other economic impacts. The Statewide Statewide CASE Team used the same monetary values that are used in the TDV factors – \$TBD /MTCO₂e.

Water Use and Water Quality Impacts Methodology

This measure is not expected to have any direct impacts on water use and water quality.



9. APPENDIX B: DCS AND HPA STRATEGIES

9.1 Ducts in Conditioned Spaces

Although DCS strategies are not common practice for CA new construction, there are several advanced home builders that have adopted DCS for new production homes as identified in Table 15 and Table 17. It is noteworthy that production home builder Meritage has made sealed attics with spray foam insulation a standard in all of its new homes in Northern and Southern California, as well as nationwide.

There are several methods of achieving the goal of DCS and in this section we outline the basic information of the strategies, their benefits, challenges, and potential solutions to those challenges.

9.1.1 Vented Attic, Dropped Ceiling

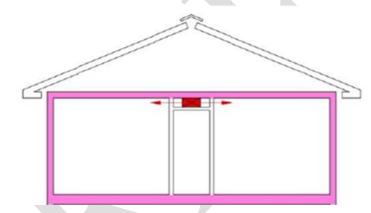


Table 38: Dropped Ceiling Option for DCS in Vented Attics (adopted from Ductsinside.org)

This strategy places ducts within the thermal envelope without affecting the standard construction of the attic space. This strategy works well in linear plans where rooms branch out from a central hallway with the dropped ceiling. Sometimes soffit spaces for duct runs are turned into room ceiling design features that change a flat ceiling into a tiered ceiling. This strategy is implemented in a PG&E ET project, the De Young project, the SMUD Home of the Future project and is being considered for other projects implementing ducts in conditioned space.

Benefits of selecting this strategy include:

- Vented attic space, same as standard practice
- Does not affect attic assembly or insulation; no changes to truss design
- Works with simple and linear designs with rooms off main hallway but can work with more complex plans
- Dropped ceilings can be integrated into architectural accents

There are challenges associated with this strategy as outlined below but they can be overcome with good design and installation practices.

- Need to address air handler location there may not be sufficient space (height, width) in the dropped ceiling to accommodate the air handler. In this case, the air handler would need to be installed in a separate closet within the thermal boundary of the home.
- Coordination needed between trades moving the ducts and air handlers and the need to isolate and seal the dropped ceiling would necessitate coordination between different trades (HVAC installer, dry-wall, framing, and electrical contractors) to ensure thermal integrity of the dropped ceiling.
- Some stakeholders have raised aesthetic concerns related to dropped ceilings in that homebuyers are said to value high open ceilings. However, this issue can be addressed by incorporating dropped ceilings in the perimeter soffits, allowing the main ceiling area to have the full height from finished floor as intended.

Title 24 requires the "right-sizing" of HVAC systems and correct duct design. With the improvements in building envelope components (tighter envelope, better insulation and higher performing fenestration products), it is estimated that typical cooling and heating systems installed now are often over-sized by a factor of two and four respectively³¹. The outdated rule of thumb was to install a ton of AC for every 500 square feet of conditioned floor area (sf CFA). Dwelling built to 2013 Title 24 will require a ton for every 1000 to 1500 sf CFA. With right-sizing and observing the ACCA Manual D and T³² rules of putting in supply grilles only as needed, the lengths of the ducts could be reduced substantially. The reduction in total duct lengths would in term make housing the ducts, both supply and return, in the dropped ceiling more feasible.

The space constraint concern also emphasizes the importance of integrated design, because if the building designer and HVAC designer are committed to placing ducts in conditioned space, the design team would make sure that dropped ceiling space is sized to house the ducts. Another solution to this could be to use alternatives to wire helix plastic flexible ducts that take up less space.

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³¹ Personal interview with Rick Chitwood, on right-sizing and the current market condition for new construction in CA, March 2014.

³² http://www.acca.org/standards/technical-manuals/

9.1.2 Vented Attic, Conditioned plenum space

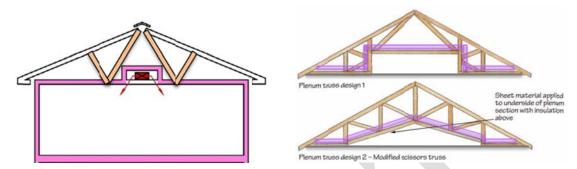


Table 39: Options for Conditioned Plenum Space (adopted from Ductsinside.org and CEC 2003c)

A conditioned plenum is created when a space within the attic is sealed off and insulated from the rest of the attic. This approach is highlighted in a Building America research project conducted by IBACOS, Inc (IBACOS, 2013)³³. To use this design option, a builder can specify two types of modified trusses; either scissor trusses or a truss configuration that creates a plenum box. According to stakeholder input³⁴, it is not difficult for a truss manufacturer to produce modified trusses based on demand. Another way to create a conditioned plenum does not involve modified trusses, but rather to create the space by framing, sealing and insulating the plenum space above the ceiling plane.

Similar to a dropped ceiling, this design is easier with a linear plan that allows for the conditioned space built in the attic to cover a central "spine" throughout the floor plan that can reach all spaces in need of supply registers. This design option allows for ducts in the attic space and does not affect aesthetics of the home.

Benefits for selecting the strategy:

- Vented attic space, same as standard construction
- Aesthetically less disruptive than dropped ceiling
- Works with simple and linear designs with rooms off main hallway

There are challenges associated with this strategy as outlined below but they can be overcome with good design and installation practices.

• Need to seal the plenum from attic – as with most of the DCS strategies, it is important that care and attention is provided to air sealing the plenum space from the attic space.

³³ http://www.nrel.gov/docs/fy14osti/60056.pdf

³⁴ Interview with William Zoeller (Steven Winters Associate), February 2014.

 May require modified trusses in which case manufacturers need to be provided with specifications that can be met. Feedback from stakeholders is that this is technically feasible and manufacturers are capable of providing these trusses.

9.1.3 Vented Attic, Open Web Floor Truss



Table 40: Open Web Floor Truss (adopted from Ductsinside.org and Steven Winter Associates, Inc. 2014)

This option can work for two-story construction and makes use of the space between floors to house ducts. Open-web floor trusses are not a common component in residential construction, but are available from several floor joist manufacturers such as RedBuilt, TrimJoist, SpaceJoist and Open Joist. The depth of floor joists may need to be increased in order to create a large enough space for supply ducts. The increased joist depth may impact interior details and wall heights. An industry expert also suggested that sometimes this could push the building height over the limit established by local jurisdiction. Because of the size constraints from using the floor truss, there is a need to preserve construction quality and prevent undesirable construction practices such as forcing 14" ducts into a 12" joist spaces. Another option is to use alternatives to wire helix plastic flexible ducts that take up less space.

Coordination between the architect and the HVAC engineer and/or contractor is needed to ensure that ducts are correctly sized and truss depths are appropriately selected. Using the area between floors to house ducts prescribes that supply registers be at the floor or lower wall in the second story and the ceiling or upper wall in the first story. Two builders in the Washington area, Quadrant Homes and New Tradition Homes, have extensively used this design and see

the benefits of open web floor trusses, which can also be used to house components of other systems (Lubliner 2008³⁵).

Benefits for selecting this strategy include:

- Works for homes with two or more stories
- Vented attic space remains same as standard practice
- Allows access to all rooms across joists since the truss is between floors
- Open access for other plumbing and electrical needs

There are challenges associated with this strategy as outlined below but they can be overcome with good design and installation practices.

- Lack of experience in California with this strategy This approach has been done for decades but has not been emphasized. We have not found any recent subdivision scale projects within California that have implemented this strategy; however, it has been adopted by two builders in the Pacific Northwest: Quadrant Homes and New Tradition Homes.
- Requires designer and trade coordination: structural, HVAC, and architectural As with many of these strategies, knowing where trades can place their components and make penetrations is important. Training and coordination are critical to ensure that trades don't get in the way of each other or cause damage to work done by another trade.
- May require deep or enhanced openings trusses to fit ducts, which could affect house height and exterior details and materials – HVAC contractors need to be consulted during the design phase so that the builder knows what truss openings will be needed to accommodate ducts and what possible impacts this will have on the height of the building Another solution to this could be to use alternatives to wire helix plastic flexible ducts that take up less space.
- Need to seal and insulate rim joists as with most of the DCS strategies, it is important that care and attention is provided to air sealing the rim joists separating the exterior conditions from the truss cavity. Two options to accomplish this are to use high-density spray foam at the rim joist, or to use a combination of fiberglass and rigid foam insulation in the joist bay at the rim location³⁶ (NEEA 2011). A visual inspection is necessary to ensure that the joiss are sealed properly.
- Running ducts to rooms above unconditioned space (garage) The joist cavities need to be insulated for areas separating conditioned and unconditioned spaces. There is often not space for both ducts and insulation in these cavities. Options to solve this are to either run ducts up interior walls to serve these rooms or run ducts through cavity

³⁵ http://www.energy.wsu.edu/documents/aceee ducts inside.pdf

³⁶ http://ductsinside.org/

and place insulation below the areas where the ducts are utilizing the cavity (NEEA 2011).

9.1.4 Unvented attic (Sealed)

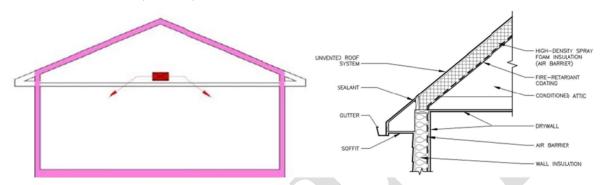


Table 41: Unvented Attic (adopted from Ductsinside.org)

Interviews with industry experts on high performance buildings shows that insulating the roof deck and sealing the attic space is a commonly constructed option for getting ducts in conditioned space. This design allows for ducts and equipment to be placed in the attic, which is in line with current construction practices. The main change is that the insulation is moved from the ceiling to the roof line – effectively extending the building thermal enclosure to the physical enclosure of the house.

Builders participating in IOU Emerging Technology programs, DOE Challenge Home program and Building America programs have provided positive feedback or showcased positive results using this method. One of the builders working with the IOU Emerging Technology program said that "sealed attics are by far the most efficient method of conserving space conditioning energy. The additional conditioned space is more than offset by the energy savings." However, he further noted that "this strategy might be cost prohibitive and construction scheduling may be difficult for production homes."

Advanced builders such as Pulte Homes, Shea Homes and Meritage have implemented this strategy in the market. Meritage, a national home builder, made the decision around 2006 to pursue sealed attics in all residential construction after researching and comparing options to reduce heating and cooling loads. They found that sealed attics eliminate the need to seal at the ceiling level, which is often compromised by penetrations for lighting, sprinker heads, and other necessary components. Although the costs may appear high, Meritage has found this method to be cost-effective in the market and they have found ways to offset some of the costs. Meritage's chief sustainability officer notes that the transition was made across the company rather than implementing it in a few developments because of their ability to drive costs down with large scale procurements.

Benefits for selecting this strategy:

- Bring attic temperatures closer to conditioned space effectively making the attic space a 'semi-conditioned' space
- Ducts and equipment stay out of the way and do not take up valuable floor space as in the traditional vented attic
- Reduces the need to seal ceiling plane around penetrations such as lighting, sprinklers etc

There are challenges associated with this strategy as outlined below but they can be overcome with good design and installation practices.

- Need to address moisture management (similar to HPA options) There are no
 documented moisture issues associated with implementing sealed attics in California to
 the Statewide CASE Team's knowledge. Several building science research studies have
 provided solutions for California climate zones based on field and simulated
 observations. Production builders that are using roof deck insulation have reported that
 they have not seen any issues related to moisture damage. If care is taken and proper
 materials are used, moisture should not be an issue for this strategy. These solutions are
 elaborated on below.
- Need to seal attic-to-deck junction as with most of the DCS strategies, it is important that care and attention is provided to air sealing the attic edges. Quality air-sealing can be accomplished with the use of air-impermeable spray foam insulation.
- Use of sealed combustion equipment All furnaces require flue vents to remove combustion gases from the building. Natural draft furnaces that draw combustion air from the space in which they are located or through ducts to the outside as specified in the mechanical code. Sealed combustion equipment will need combustion air piping or ducting installed as specified by the manufacturer.
- Product service life for asphalt tile roofing A study performed by BSC (2006)³⁷ found that the impact to roof surface temperature due to unvented attics is the same as adding a radiant barrier in a vented attic. Roof color and orientation have more important impact on lifespan that the presence of roof deck insulation. Builders who are concerned can use above-deck insulation products with integrated ventilation, or add spacers or "counter batten" to provide more air spaces for ventilation.

There is wide variety of available insulation products that can be used for sealed attic, however, special attention is needed when using <u>air-permeable</u> insulation under the roof deck. Installation of air-permeable insulation below the roof deck on its own allows interior moisture source to cause condensation on the interior surface and within insulation via air movement. Since the attic space is unvented, the interior moisture will not have proper dryer potential to air out any moisture accumulated in the insulation. Therefore, proper measures are needed to use air-permeable below deck insulation for unventee attics.

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³⁷ http://www.buildingscience.com/documents/digests/bsd-102-understanding-attic-ventilation

The mechanical part of the California Building Code, Title 24, Part 2 (Mechanical), Volume 2.5 Section R806.5³⁸ dictates that unvented attics are allowed provided that:

- Air-impermeable insulation is used below deck and in direct contact with the underside of the roof sheathing, or
- Air-permeable insulation is used below and in direct contact with the underside of the roof sheathing and rigid board or sheet insulation of at least R-4 is used above the roof sheathing, or
- Air-impermeable insulation is used below and in direct contact with the underside of the roof sheathing and an additional layer of air-permeable insulation is installed directly under the air-impermeable insulation.

In plain language, the CBC requires that air-permeable insulation may be used below the roof deck for unvented attics if a layer of air-impermeable is used in conjunction; the impearmeable layer could either be in direct contact with the interior space (to block air movement) or above the roof deck to decrease the temperature difference (thus the condensation forming potential) experienced by the interior surface of the permeable insulation layer.

The International Residential Code (IRC) has similar requirements as the CBC per above (reasonably so since the CBC is adopted from IRC). In addition, IRC requires that no Class I vapor barrier should be installed on the underside of below-deck insulation. Further, IRC requires a certain amount of air-*im*permeable insulation above deck if air-permeable insulation is installed below roof deck. The following values are listed by IRC climate zones:

IECC/IRC CLIMATE ZONE	MINIMUM RIGID BOARD ON AIR-IMPERMEABLE INSULATION R-VALUE	APPLICABLE TITLE 24 CLIMATE ZONES
2B and 3B tile roof only	0 (none required)	11-15 with tile roof
1, 2A, 2B, 3A, 3B, 3C	R-5	1-6, 11-15 with non-tile roof
4C	R-10	1
4A, 4B	R-15	NA
5	R-20	16
6	R-25	NA
7	R-30	NA
8	R-35	NA

^{38 &}lt;a href="http://www.ecodes.biz/ecodes_support/free_resources/2013California/13Residential/PDFs/Chapter%208%20-%20Roof-Ceiling%20Construction.pdf">http://www.ecodes.biz/ecodes_support/free_resources/2013California/13Residential/PDFs/Chapter%208%20-%20Roof-Ceiling%20Construction.pdf

9.1.5 Mechanical Closet (and Placement of Sealed Combustion Furnace)



Table 43: Interior Furnace with Ducts in Conditioned Plenum Space (IBACOS 2013)

As part of the requirement for moving duct system and air handler into conditioned space, construction of a mechanical closet is necessary with some DCS strategies. For example, if ducts are placed in dropped ceiling space but there is not enough room to accommodate the air handler in that space, the mechanical closet could be placed in the interior of the building's thermal boundary. A conditioned plenum provides enough space for ducts equipment so a mechanical closet may not be needed. For sealed attics, the equipment would be placed in the attic space, and a mechanical closet is not needed.

Placing the equipment in conditioned space requires the use of sealed combustion furnaces. The use of sealed combustion furnace in residential new construction buildings is standard practice in cold climates. Industry experts interviewed explained that sealed combustion

furnaces (most of them are condensing furnace with AFUE level higher than 90%) are selected in cases where builders are looking for the "extra credit" to quality for utility program incentives or when using the performance path to offset impacts of increased fenestration area.

The footprint of the furnace with necessary clearance for connections can be up to 4 feet by 4 feet. Stakeholders interviewed by the Statewide CASE Team have said that maximizing conditioned floor space is important for home builders, thus any mechanical closet added will impact on CFA.

Another concern about putting furnaces of any kind in the conditioned space is about noise. There are several "best practices" and precautions that can be taken to reduce noise issues associated with locating furnaces in closets within the home. A few of these include: sizing ducts correctly, using insulated flex ducts for the return and last few feet of supply, locating furnace away from bedrooms, mounting furnace on vibration pads, and selecting proper grilles for required air flow (NEEA 2011³⁹).

9.1.6 Ductless Systems

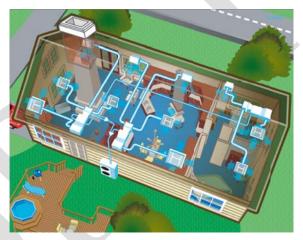


Table 44: Whole House Ductless System (Daikin variable refrigerant flow system)

According to insights from the California Advanced Homes Program and PG&E ET team, ductless systems are uncommon in production homes, but are more frequently used in custom homes through the program. Homes in coastal climate zones are likely to use hydronic radiant floor heating and go without a cooling system. In valley CZs hydronic radiant ceiling heating and cooling is introduced with good results.

³⁹ http://Ductsinside.org

9.2 High Performance Attics

HPA is achieved by installing group of measures that are minor changes to the standard construction practice. Building a home with the HPA option will allow ducts and air handler to remain in the vented attic. If moving ducts and equipment into conditioned space is not desirable or practical for a project, builder could choose to implement the list of measures under the HPA package instead.

9.2.1 Roof deck insulation

Table 45: Above and Below Deck Insulation Comparison

	Above-deck Insulation	Below-deck Insulation
Nailable base	Requires use of OSB over insulation or insulation product with facing,	NA
Roof deck ventilation (for tile or asphalt products)	Requires use of special insulation products, spacers, or battens	NA
Moisture management	Requires addition of OSB above insulation and air barrier below insulation. Care and attention to details needed to eliminate roof leaks.	Need for moisture management if air-permeable insulation is used. Care and attention to details needed to eliminate roof leaks.

Above Deck Insulation

From industry interviews, the Statewide CASE Team finds that it is not common, even with advanced homes, to place insulation above the roof deck in addition to the ceiling insulation. Due to this, it is likely that the California residential building labor force will need to learn new installation techniques.

On the other hand, there are a reasonable number of manufacturers and product selection available. This could likely be a result of the use of above rof deck insulation for nonresidential buildings in California.

There are several issues that need to be addressed with above deck rigid insulation including:

- Fire rating performance of roofing products
- Product attachment and ventilation
- Moisture management: water leaks and vapor condensation

However each of these issues has known solutions, so that this strategy is viable as an option for HPA.

Fire rating performance of roofing products

California requires roofing products to obtain a minimum fire rating class C, while class B is required in some areas, and Class A products are required in Wildfire Urban Interface (WUI) per the procedures and classification of ASTM E-108 (/UL 790). The roof covering product fire rating tests are generally conducted with products installed directly on the wood deck. Industry stakeholders have expressed concerns that the current firing rating certifications will no longer be applicable because the addition of above-deck insulation (underneath the roofing products) alters the configuration of the assembly. The issue of roofing product fire rating warrants further research to assess the effects of placing roof products above the above-deck insulation. Industry stakeholder suggest that once the CEC determines the appropriate configuration(s) of roof assemblies that satisfy the prescriptive roof deck insulation requirements, the roofing manufacturers would proceed to re-certify their products to the specified configurations in order to satisfy the state's roof covering fire rating requirement.

Product attachment and ventilation (relating to performance and service life)

The nailable base for asphalt roofing can be addressed by installing an OSB or plywood layer over the insulation. Having a nailable base is useful for tile roof installation as well, as there is sometimes the need (for nailable surface) to further secure the tiles in area of higher wind load.

Installing spacers directly over the roof deck insulation or to a layer of roof sheathing placed over the insulation can address the nailable surface requirement <u>and</u> provide continuous ventilation. Having continuous ventilation below the roof products effectively lowers the temperature seen by the roof, thus prolonging roof product service life. This solution addresses the moisture (underneath roof products/above the rigid foam) and roof surface temperature concerns.

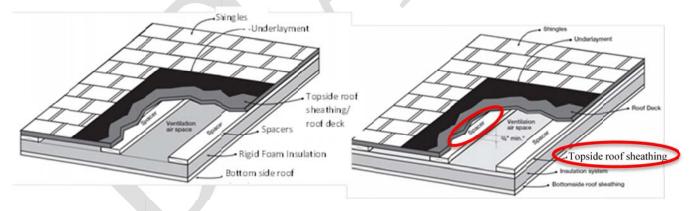


Table 46: Ventilation for Asphalt Shingles (ARMA Form No. 211-RR-94 2008)

Responding to market needs, some foam boards product now come with an integrated OSB or plywood layer. An additional layer of OSB or plywood will require longer screws to reach the required depth in each rafter; these screws are generally more expensive than the standard screws used to secure roof sheathing because of their larger size and length.

Some polyiso products are manufactured with a ventilated nail base (VNB), which is a layer of polyiso with spacers and an OSB layer to provide a nailable base and ventilation for asphalt shingles. There are similar products available with OSB facings but no spacers for ventilation.

Installation of above-deck rigid foam insulation with tile roofs also presents problem in terms of product ventilation. The structure and installation of tiles provides a natural ventilation space directly underneath the tiles and an additional thermal benefit on the order of R- 2.75⁴⁰. The addition of above-deck insulation reduced this "natural ventilation" for the tiles, and an industry stakeholder suggests installation of counter or double battens to increase the height of air space to ensure ventilation.



Table 47: Ventilation for Tile Roofing – Counter Batten (CBIA Forum)

Moisture management

There are two places where moisture management is a concern with installation of above-deck insulation: underneath roof products/above the rigid foam, and under the rigid foam/above the roof deck sheathing. As described in the section immediately above, using an additional layer of wood sheathing supported by spacers placed on the rigid foam could address the moisture concern between the rigid foam and roofing products (and provide ventilation for roofing products).

In the case of moisture-laden air infiltrating the joints in the rigid foam, the moisture could potentially travel through the penetrations and reach the roof deck. To prevent the moisture from traveling (in between rigid foam panels) to the roof deck, installation of an air barrier membrane would effectively block the moisture air and moisture problem associated with the connection between above-deck insulation and the wood decking.

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⁴⁰ Presentation by Jay Cruz (Boral Roofing LLC) during CIBA and CEC Forum on April, 4 2014.

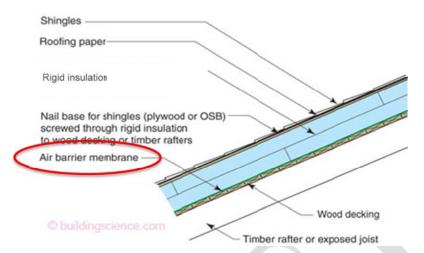


Table 48: Moisture Management in Above Roof Deck Insulation (BSC)

Below Deck Insulation

Below deck insulation (directly in contact with underside of roof deck) is the most common method of installing roof deck insulation in all the high-performance homes studied as part of this CASE project. There are several options for insulation products as outlined in Section 3.1 on roof deck insulation. It should be noted that certain insulation products such as blown-in or closed cell spray polyurethane foam (cc-SPF) require specific equipment, and therefore may require a separate insulation contractor.

Similar to above-deck insulation, there are also moisture management considerations for use of below-deck insulations but the same solutions as those discussed for above deck insulation apply. The CEC commissioned a study for the 2013 standards on vented attic with below deck insulation, and the hygrothermal simulation results showed that air permeable insulation may be installed under the roof deck of a vented attic without moisture issues in all but CEC climate zone 16.

9.2.2 Increase Duct insulation to R8 in all Climate Zones

Duct insulation products are widely available in the state. Results from the expert interviews indicate that R-6 is the current default minimum since R-4.2, which until July 2014, was the prescriptive minimum has largely vanished from suppliers. Suppliers in general currently do not stock R-8 because the demand has not yet picked up. With R-8 as the prescriptive baseline in four climate zones (CZ 11, 14-16) in the 2013 Standards, the availability of R-8 duct insulation is expected to increase.

In terms of installation, R-8 installation is bulkier to work with than R-6 and there is anecdotal evidence of installer reluctance to use R-8. However, in a typical vented attic (as is assumed for HPA), there is adequate space to maneuver and install R-8 insulation.

9.2.3 Reduced Duct Leakage

Standard duct installations in CA often meet or exceed the 6% duct leakage requirement in Title 24. The HERS database does not track the actual duct leakage rate – just whether the building meets the Title 24 requirements. However, anecdotal evidence through our interviews with industry experts suggest that reducing duct leakage below the current 6% requirement is common among advanced new home construction in California where HERS testing has been required for a while and there is overall intent to improve building performance.

According to our interviews with HERS raters, there are duct leakage "weak points" within current installation practices that present opportunities for achieving lower leakage rates:

- air handler unit
- the connection at joints
- Between duct boots to drywall/carpet.

Most interview respondents noted that using low leakage air-handlers (LLAHs) is the best way to achieve 4% or lower leakage. Further one of the interviewees notes that Pulte Homes exclusively uses LLAHs (Personal communication 2014).

Low leakage air handlers are factory certified to have leakage lower than 2% of the nominal airflow rate. Though these low leakage units are higher in costs, there are many available products in the market certified through the ENERGY STAR® program⁴¹ as well as listed in the CEC database. The CEC's 2008 database contains over 1600 certified low leakage air handler models from many major manufacturers⁴².

Leakage that occurs at duct boot connection to interior space can be reduced by installing boots with flanges or other parts designed to lower duct leakage. Installers could also ensure tighter connections by applying the appropriate amount of sealant material/ties and properly strapping and sealing inner linings at connections. HVAC contractors and painters do not agree on whose responsibility it is to perform sealing at the connection (HVAC contractor vs. painter), so clear division of responsibility in the project team could also mean the job gets done properly.

Although there are duct sealing protocols to follow to achieve tighter ducts, the experts interviewed agreed that there are implementation challenges in a production home environment. The challenges stem from having a tight construction schedule and its impact on time and attention allotted to installation details. Most production builders feel that they can't get the systems any tighter than it currently is. The implication for production builders is that HVAC contractors will have to be trained on the improved installation practices.

⁴¹ Program Criteria for 4.0 for Furnaces:

http://www.energystar.gov/ia/partners/prod_development/revisions/downloads/furnaces/Final_Version_4.0_Specification.pdf?

0803-1d33

⁴² http://www.energy.ca.gov/title24/equipment_cert/llahu/index.html

9.2.4 Energy Truss (Raised Heel or Extension Truss)

The use of raised heel or extension truss to allow full depth of ceiling insulation is rare in California. One of the experts interviewed noted that the practice is common in the Northeast region of the country.

Energy trusses, which include raised heel trusses and extension trusses, are not common among California builders. One northeast building expert says he sees them all the time, and that the design process is streamlined; however, this is not the input received from California builders and building experts. Feedback from the Statewide CASE Team's interviews indicated that the use of energy truss changes the aesthetics of the house that some home owners dislike. It is also possible that the added height could push the total building height limit set by local jurisdictions. Other methods to achieve the similar outcome include framing with a rafter on raised top plate or utilizing spray foam or rigid foam at the edge.

As mentioned during interviews, a few builders looked into the possibility of constructing these components to comply with the ENERGY STAR New Homes requirements, but did not ultimately pursue this design due to changes that the EPA made to the ENERGY STAR version 3 criteria. The EPA ENERGY STAR homes first release of proposed requirements for 2011 had originally required full depth ceiling insulation at attic edges. However, several builders responded against this requirement, and the final requirement, as also seen in version 3, is to allow for a lower insulation level at the attic edges while also proposing methods other than raised heel trusses that can achieve the required insulation level. The builder comments and EPA responses from the 2011 requirements are provided in the figure below.

Rais	ed-	Heel Truss & Attic Platform		-	
103	•	Another major concern expressed by respondents was over the height impacts of requiring a raised heel truss. o Five respondents had concern with the impact on height, typically citing situations where local zoning requirements imposed height restrictions o One respondent noted, "certain	EPA's review of this requirement indicates that it will only increase house height by approximately 8-12 inches. It is not clear to EPA that this small increase will create a widespread hardship for homebuilders. Furthermore, EPA has observed raised heel trusses or equivalent framing techniques being used successfully across many markets and all builder types.	•	No policy change.
		narrow lot developments and home designs are not conducive to the use of raised heel trusses."			
104	•	Regarding the 'full-depth' requirement, respondents had concerns about high R-value attic insulation requiring a particularly high raised-heel truss. One suggested changing the requirement to a specified depth that provides adequate – but likely not full depth – insulation at the roof edge. Eight inches was suggested as an appropriate number.	EPA agrees with respondents that near-full-depth insulation should be sufficient to meet EPA's goal of ensuring a complete thermal enclosure system. Because the required depth of insulation will vary by insulation type and climate, EPA prefers to define the requirement in terms of its intent and allow the rater and builder partners to translate this into the height required for each home.	•	EPA has revised the proposed guidelines to clarify the requirement as follows: "Raisedheel trusses or equivalent framing techniques shall elevate the roof adequately to allow for insulation at a depth of at least 75% of full insulation level used throughout the rest of the attic."

Table 49: EPA Responses to ENERGY STAR 2011 Qualified New Homes Comments

The notes for the Version 3 (Rev. 07) ENERGY STAR checklist say that "these requirements can be met by using any available strategy, such as a raised-heel truss, alternate framing that provides adequate space, and/or high-density insulation" (EPA 2013). Additionally, the Northwest division of ENERGY STAR Homes (WA, OR, MT, ID) mentions on a FAQ page that this requirement can be met with "cantilevered trusses with wider overhangs, framing with a rafter plate, utilizing spray foam or rigid foam at the edge, or moving your ventilation up the

roof deck to eliminate baffles and increase space for insulation".⁴³ Another alternative provided by a building expert from an IOU ET project, though noted as probably not the best option, is to add soffits at the exterior walls and allow the loose fill insulation to fill the cavity.

Energy trusses have been tried out by several builders, including Meritage, Standard Pacific, GJ Gardner and Wathan Castanos, but has not been adopted as a standard or prevalent practice by any.

Benefits for using an energy truss include:

- Helps realize full benefit of insulation
- May provide more space for air handler and duct systems
- It is easy for the truss manufacturer to customize trusses through pre-fabrication

Challenges for using energy trusses include:

- Low level of installation experience in California and corresponding labor experience
- Changes aesthetics of the house, and sometimes create building height that exceed height limit set by local jurisdictions.
- Builders and energy consultants cited that the modeling software does not give the proper credit, so the extra cost and effort is not "worth the trouble". This should no longer be an issue with the release of the 2013 software, which allows for modeling of raised heel trusses and provides credit for the additional insulation at the edges.

9.2.5 Reduce Duct Surface Area (Duct Design Layout)

Reduced duct surface area is currently a compliance credit, titled "Verification of Supply Duct Surface Area Reduction", but feedback received from industry experts indicates that it is rarely taken due to various barriers that make the process burdensome for builders and HVAC contractors. Observations from a CAHP program manager is that builders are beginning to claim this credit in the program, but at a very low occurrence.

The standards require the following procedure to qualify for the compliance certificate:

- 1. A scaled drawing that identify all equipment location, supply and return grilles, sizes, insulation values and location of each duct segment, and
- 2. Installer certificates and HERS verifications and certificates.

The Statewide CASE Team received the following reasons from industry experts, including HERS raters and energy consultants, for why builders do not use this compliance option frequently:

• Duct layout can change in the field during installation; so builders do not want to commit to a layout to perform compliance calculation before the plans and construction are completed.

⁴³ Northwest ENERGY STAR Homes 2013: http://www.northwestenergystar.com/sites/default/files/resources/NWESH_FAQ_0.pdf

- Calculation process to show a reduced duct surface area is tedious.
- Efficient and compact duct design is practiced, but builders do not want to pay for an additional HERS verification

The compliance software has a default value of 27 percent supply duct surface area based on the field work performed as part of CEC's 2002 Residential Construction Quality Assessment study (DEG 2002). The calculation performed using the field data showed that even though the supply duct surface area averaged 27 percent, there was a wide variation (between 20 and 53 percent supply duct surface area as % conditioned floor area) between the 22 one-story houses tested, as shown in Table 50.

Table 50: Duct Surface Area Summary (Table 5 from DEG 2002 report)

		Duct surface are	a as % condition	ed floor area
		Supply	Return	Total
All Houses	Average	32.0%	7.8%	39.8%
One-Story	Appendix F	27.0%	5.0%	32.0%
(count = 22)	Average	31.9%	7.5%	39.4%
	Minimum	20.2%	2.0%	23.5%
	Maximum	52.5%	16.6%	65.1%
Two-Story	Appendix F	27.0%	10.0%	37.0%
(count = 8)	Average	32.3%	8.8%	41.1%
	Minimum	26.0%	0.5%	32.4%
	Maximum	42.9%	16.9%	52.7%
>1 HVAC	Average	32.1%	8.4%	40.5%
System	Minimum	21.5%	2.0%	23.5%
(count = 5)	Maximum	52.5%	16.9%	61.1%

The Statewide CASE Team proposes for the calculation process for taking the compliance credit for "Verification of Supply Duct Surface Area Reduction" be streamlined by integrating the duct surface area calculation into the software. The CASE further proposes that instead of requiring the builder/HVAC designs to choose a supply duct surface area when they submit the construction documents that they later have to match exactly, that the compliance credit designates a "duct surface area "limit" that the builder/HVAC designers will commit to staying below. This will make the requirement much more reasonable to demonstrate while encouraging the practice of verified duct design.

Attic Ventilation Ratio

The Statewide CASE Team originally considered an increase in the attic ventilation ratio to 1/150 from the current 1/300 as a potential package component. However, the team did not ultimately pursue this measure due to conflicts with the 2013 Standards and the compliance software modeling assumptions. The 2013 Title 24 Standards incorporate a prescriptive requirement for a Whole House Fan in climate zones 8-14 which induces a higher ventilation rate than the current 1/150. In other climate zones, the compliance software assumes a fixed

ventilation rate of 1/300, so this measure is already factored in to the energy budget in the compliance software.



10. APPENDIX C: COST DATA SOURCES

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11. APPENDIX D: SIMULATION RESULTS USING CBECC-RES

11.1 DCS Strategies

11.1.1 Vented Attic

The following modeling options for DCS are available in the 2013 Standards⁴⁴:

- Ducts in conditioned space except for 12 linear feet: visual inspection
- Ducts entirely in conditioned space: visual inspection
- HERS verified ducts entirely in conditioned space: visual inspection, duct leakage to outside HERS test

All three of the DCS -Vented Attic strategies (dropped ceiling, conditioned plenum and open web floor trusses) are variations of the "ducts entirely in conditioned space" performance option. The "verified" option is available if a verified "leakage to outside" test is performed to demonstrate performance.

The energy impacts of duct placement is climate dependent. Climate zones with the highest cooling loads have the largest savings from minimizing duct losses via placing them in vented attics. The first option, "except < 12 lineal feet" is the lowest performing because parts of the duct lengths are assumed to be exposed to the vented attic with associated convection and leakage losses.

Savings range from 17% in the hottest climate zones (CZ13) for the "verified" option, to 2.5% in the mildest climate zone (CZ7) for the not "verified" option. The statewide weighted TDV savings from these DCS strategies are 7.5% for "except < 12 lineal feet" (Case 1), 9.4% for "ducts entirely in conditioned space" (Case 2), and 13.3% for the "verified" option (Case 3) as shown in the table below.

⁴⁴ Total duct leakage HERS test is a mandatory requirements that applies to all new construction buildings, regardless of whether DCS design strategy is chosen

Case 1	Ducts located within the conditioned space (except < 12 lineal ft)
Case 2	Ducts located entirely in conditioned space
Case 3	Verified low-leakage ducts entirely in conditioned space

	% TDV Saving	s: (Baseline - Proj	posed)/Baseline
Climate Zone	Case 1. Except < 12 lineal ft	Case 2. DCS	Case 3. Verified DCS
1	6.9%	8.4%	11.6%
2	5.7%	7.0%	9.9%
3	4.9%	6.0%	8.1%
4	7.1%	8.8%	11.5%
5	4.2%	5.0%	7.0%
6	4.9%	6.0%	7.8%
7	2.1%	2.5%	3.2%
8	6.3%	7.9%	10.3%
9	8.5%	10.6%	14.6%
10	8.7%	10.8%	14.6%
11	7.9%	10.0%	15.0%
12	8.8%	11.0%	14.8%
13	9.2%	11.6%	16.9%
14	8.1%	10.2%	15.1%
15	7.0%	8.8%	15.7%
16	7.4%	9.2%	13.4%
Weighted Statewide	7.5%	9.4%	13.3%

Energy cost savings from the energy reduction due to implementing DCS- vented attic strategies are presented in the table below. These cost savings may be interpreted as the maximum amount of first cost that would make the energy measure cost "neutral", because it would, over the 30-year building life time, produce equivalent energy cost savings. The highest cost savings for implementing the "verified ducts entirely in conditioned space" is over \$7000 for CZ 15 (Palm Springs), and the lowest is \$133 for CZ 7 (San Diego).

	Present Value Energy Cost Savings		
Climate Zone	Case 1. Except < 12 lineal ft	Case 2. DCS	Case 3. Verified DCS
1	\$1,266	\$1,543	\$2,135
2	\$872	\$1,067	\$1,514
3	\$537	\$654	\$883
4	\$984	\$1,213	\$1,593
5	\$412	\$499	\$689
6	\$434	\$535	\$692
7	\$133	\$163	\$203
8	\$684	\$856	\$1,125
9	\$1,401	\$1,750	\$2,426
10	\$1,504	\$1,872	\$2,524
11	\$2,457	\$3,099	\$4,656
12	\$1,858	\$2,322	\$3,140
13	\$2,948	\$3,736	\$5,433
14	\$2,388	\$3,004	\$4,446
15	\$3,195	\$4,040	\$7,194
16	\$2,039	\$2,552	\$3,705
Weighted Statewide	\$1,255	\$1,568	\$2,205

11.1.2 Unvented Attic

As described in Section 3.2.3, another way to have ducts and equipment in conditioned space is moving the thermal boundary of the house from the ceiling to the roof line and creating an Unvented Attic for placement of ducts and a sealed combustion furnace. The implementation of an unvented attic in CBECC-res was made possible by the CBECC-res software team through a research version. In this version, the attic over the garage was eliminated since the software cannot handle multiple attics when modeling unvented attics.

Overall, utilizing unvented attics to house ducts and equipment in conditioned space did not perform as well as choosing DCS strategies with vented attics. Even with R-38 at the roof line of an unvented attic, the weighted statewide savings (at 8.6%) performs inferior to the case of "ducts entirely in conditioned space" for the vented attic (with no verification).

The CBECC-res team identified several key reasons for this:

- A whole house fan is not feasible with an unvented attic and as such is not modeled for unvented attics. This decision was made because a whole house fan operation defeats the primary purpose of constructing an unvented attic by purposefully introducing ventilation air from the conditioned space that has no outlet to the exterior.
- The software does not include a radiant barrier for unvented attics since installation of below-deck insulation (most prevalent method of insulating the roof deck) makes installation of radiant barrier impractical.
- The performance of insulation degrades as the delta across the insulation increases. For an unvented attic, the temperature difference across the insulation (roof deck on one side, semi-conditioned space on the other side) is much higher than the temperature difference for the same insulation when installed in a vented attic. Thus, R38 at roof deck has lower overall performance than R38 at the ceiling.
- The software assumes that the overall leakage from the house is the same regardless of whether the attic is vented or unvented. Since most attic leaks occur at the junction of the roof deck and ceiling, there is no net difference in overall leakage from the attic, assuming that the junction is not sealed, which is standard practice even in unvented attics due to the difficulty of sealing that junction.

Case 1	Package R + No RB + No WHF + Ducts in Unconditioned Attic
Case 2	R19 + No RB + No WHF + Ducts in Unconditioned Attic
Case 3	R30 + No RB + No WHF + Ducts in Unconditioned Attic
Case 4	R38 + No RB + No WHF + Ducts in Unconditioned Attic

	% TDV Savings: (Baseline - Proposed)/Baseline			
Climate Zone	Case 1. Unvented Attic Base	Case 2. Unvented Attic R-19 below deck	Case 3. Unvented Attic R-30 below deck	Case 4. Unvented Attic R-38 below deck
1	9.6%	2.3%	7.5%	9.6%
2	6.9%	0.6%	6.9%	9.3%
3	4.7%	-0.5%	4.7%	6.7%
4	7.6%	0.5%	7.6%	10.3%
5	3.7%	-1.5%	3.7%	5.7%
6	4.1%	-1.8%	4.1%	6.4%
7	0.0%	-5.6%	0.0%	1.9%
8	-0.4%	-9.9%	-0.4%	3.2%
9	6.1%	-2.8%	6.1%	9.7%
10	6.1%	-1.5%	6.1%	9.1%
11	9.8%	0.2%	7.1%	9.8%
12	6.6%	-5.1%	3.3%	6.6%
13	12.1%	2.2%	9.3%	12.1%
14	9.7%	-0.1%	6.9%	9.7%
15	12.6%	4.5%	10.3%	12.6%
16	11.4%	2.6%	8.9%	11.4%
Weighted Statewide	7.0%	-1.8%	5.7%	8.6%

Case 2 (R-19 at roof deck) results in negative energy savings in more than half of the climate zones (9 out of 16), including all of the cooling climate zones, because the 2013 mandatory roof/ceiling insulation level is R-30. R-30 and R-38 roof deck insulation result in energy savings for all climate zones (except for R-30 in CZ8).

_	Present Value Energy Cost Savings			
Climate Zone	Case 1. Unvented Attic Base	Case 2. Unvented Attic R-19 below deck	Case 3. Unvented Attic R-30 below deck	Case 4. Unvented Attic R-38 below deck
1	\$1,752	\$423	\$1,375	\$1,752
2	\$1,063	\$93	\$1,063	\$1,425
3	\$518	(\$54)	\$518	\$736
4	\$1,052	\$73	\$1,052	\$1,420
5	\$364	(\$145)	\$364	\$563
6	\$366	(\$156)	\$366	\$564
7	\$1	(\$362)	\$1	\$120
8	(\$44)	(\$1,074)	(\$44)	\$350
9	\$1,017	(\$458)	\$1,017	\$1,604
10	\$1,048	(\$267)	\$1,048	\$1,563
11	\$3,054	\$57	\$2,202	\$3,054
12	\$1,401	(\$1,087)	\$692	\$1,401
13	\$3,877	\$711	\$2,981	\$3,877
14	\$2,851	(\$16)	\$2,037	\$2,851
15	\$5,795	\$2,072	\$4,746	\$5,795
16	\$3,156	\$729	\$2,469	\$3,156
Weighted Statewide	\$1,157	(\$294)	\$943	\$1,426

11.2 HPA Individual Measures

11.2.1 Roof Deck Insulation (in addition to Ceiling Insulation)

Simulation results for installation insulation above or below the roof deck are presented below. The roof deck insulation is <u>in addition to</u> the ceiling insulation level required by the 2013 Standards prescriptive requirements (R-30 for CZ 2-10; R-38 for CZ 1, 11-16). For the below deck insulation cases, Case 4 and 5, the team disabled the radiant barrier layer because it is not practical to install a radiant barrier below the below-deck insulation layer (and any integrated radiant barrier built-in to the deck OSB would not provide the intended benefits).

Case 1	R4 Above Deck	Case 4 R11 Below Deck
Case 2	R6 Above Deck	Case 5 R13 Below Deck
Case 3	R8 Above Deck	

Roof deck insulation is the most impactful measure within the list of HPA measures investigated by the project team. Installation of roof deck insulation provides substantial energy benefits, on the order of 10% TDV savings. Roof deck insulation is more effective in providing thermal resistance to the roof assembly, as evident by R-6 above deck (Case 2) and R-13 below deck (Case 5) insulation exhibiting similar TDV savings.

	9/6	% TDV Savings: (Baseline - Proposed)/Baseline			
Climate Zone	Case 1. R4 above deck	Case 2. R6 above deck	Case 3. R8 above deck	Case 4. R11 below deck	Case 5. R13 below deck
1	4.2%	5.5%	6.5%	5.7%	6.2%
2	5.3%	6.8%	7.9%	6.0%	6.6%
3	3.5%	4.5%	5.4%	3.9%	4.4%
4	6.4%	8.0%	9.3%	7.0%	7.7%
5	3.5%	4.6%	5.4%	3.8%	4.2%
6	5.1%	6.6%	7.6%	5.2%	5.8%
7	3.1%	3.7%	4.1%	2.9%	3.1%
8	10.6%	13.0%	14.6%	11.0%	11.9%
9	11.5%	14.1%	16.0%	12.1%	13.1%
10	10.2%	12.6%	14.4%	10.8%	11.7%
11	8.3%	10.4%	11.9%	8.7%	9.5%
12	9.4%	11.8%	13.6%	9.9%	10.8%
13	9.3%	11.6%	13.3%	10.0%	10.9%
14	7.4%	9.3%	10.7%	7.8%	8.5%
15	8.1%	10.4%	12.1%	9.0%	10.0%
16	5.8%	7.5%	8.8%	7.5%	8.2%
Weighted Statewide	8.5%	10.6%	12.2%	9.1%	9.9%

	Present Value Energy Cost Savings				
Climate Zone	Case 1. R4 above deck	Case 2. R6 above deck	Case 3. R8 above deck	Case 4. R11 below deck	Case 5. R13 below deck
1	\$762	\$1,000	\$1,189	\$1,039	\$ 1,129
2	\$812	\$1,037	\$1,206	\$913	\$ 1,011
3	\$381	\$494	\$586	\$428	\$ 478
4	\$882	\$1,109	\$1,280	\$962	\$ 1,063
5	\$348	\$453	\$530	\$376	\$ 421
6	\$452	\$580	\$673	\$464	\$ 518
7	\$196	\$235	\$260	\$183	\$ 198
8	\$1,158	\$1,413	\$1,592	\$1,195	\$ 1,295
9	\$1,899	\$2,337	\$2,644	\$2,003	\$ 2,174
10	\$1,769	\$2,184	\$2,485	\$1,859	\$ 2,023
11	\$2,572	\$3,221	\$3,697	\$2,707	\$ 2,956
12	\$1,989	\$2,494	\$2,872	\$2,090	\$ 2,290
13	\$2,994	\$3,719	\$4,254	\$3,219	\$ 3,503
14	\$2,189	\$2,749	\$3,158	\$2,292	\$ 2,497
15	\$3,721	\$4,773	\$5,553	\$4,109	\$ 4,600
16	\$1,598	\$2,067	\$2,440	\$2,087	\$ 2,270
Weighted Statewide	\$1,419	\$1,768	\$2,023	\$1,509	\$ 1,649

11.2.2 Duct Insulation and Leakage Rate

Percent energy savings and energy cost savings result from increased duct insulation and lower duct leakage levels are presented in the tables below. Although the total duct leakage HERS test is mandatory measure for the 2013 Standards, the compliance software does not allow modeling a leakage level of 6% or below unless the "verified installation of LLAH" option is selected and performed by a HERS rater. Instead, the total duct leakage level assumption is restricted at 8% in the modeling software. Therefore Case 3 (6% duct leakage) results in positive energy savings.

Case 1	R6 Ducts
Case 2	R8 Ducts
Case 3	6% Duct Leakage
Case 4	4% Duct Leakage

Improving the duct insulation and total leakage rate yield average statewide TDV savings of around 1.0 and 1.8% respectively, which is significantly less than roof deck insulation.

	% TDV Savings: (Baseline - Proposed)/Baseline			
Climate Zone	Case 1. R6 Ducts	Case 2. R8 Ducts	Case 3. 6% Duct Leakage	Case 4. 4% Duct Leakage
1	0.0%	1.1%	0.8%	1.5%
2	0.0%	0.9%	0.7%	1.4%
3	0.0%	0.8%	0.5%	1.0%
4	0.0%	1.1%	0.6%	1.3%
5	0.0%	0.7%	0.5%	0.9%
6	0.0%	0.8%	0.5%	0.9%
7	0.0%	0.4%	0.2%	0.3%
8	0.0%	1.1%	0.7%	1.2%
9	0.0%	1.4%	1.0%	2.0%
10	0.0%	1.4%	0.9%	1.8%
11	-1.5%	0.0%	1.2%	2.4%
12	0.0%	1.4%	0.9%	1.8%
13	0.0%	1.5%	1.3%	2.6%
14	-1.5%	0.0%	1.2%	2.4%
15	-1.5%	0.0%	1.5%	2.9%
16	-1.4%	0.0%	1.0%	2.0%
Weighted Statewide	-0.3%	1.0%	0.9%	1.8%

	PV Energy Cost Savings			
		P v Energy		T
Climate Zone	Case 1. R6 Ducts	Case 2. R8 Ducts	Case 3. 6% Duct Leakage	Case 4. 4% Duct Leakage
1	\$0	\$201	\$143	\$ 282
2	\$0	\$136	\$109	\$ 211
3	\$0	\$84	\$56	\$ 112
4	\$0	\$159	\$89	\$ 184
5	\$0	\$66	\$48	\$ 94
6	\$0	\$68	\$42	\$ 79
7	\$0	\$23	\$13	\$ 19
8	\$0	\$117	\$71	\$ 136
9	\$0	\$234	\$172	\$ 340
10	\$0	\$250	\$159	\$ 308
11	(\$463)	\$0	\$381	\$ 749
12	\$0	\$302	\$199	\$ 390
13	\$0	\$493	\$412	\$ 821
14	(\$445)	\$0	\$353	\$ 697
15	(\$668)	\$0	\$685	\$ 1,312
16	(\$385)	\$0	\$282	\$ 556
Weighted Statewide	(\$43)	\$170	\$155	\$ 305

11.2.3 Raised Heel Trusses

The compliance software assumes a truss heel height of 3 ½" as the default and thus assumes that the insulation is compressed at the truss heel and derates the value of the installed insulation. Incorporating a raised heel truss with a modified heel height of 12" accommodates the full thickness of R-30 and R-38 blown-in fiberglass insulation, enabling full account of the installed insulation. The energy and cost savings results from installing a 12" raised heel are presented in the table below.

	% TDV Savings: (Baseline - Proposed)/Baseline	PV Energy Cost Savings
Climate Zone	RHT – 12"	RHT – 12"
1	0.8%	\$139
2	0.9%	\$138
3	0.7%	\$78
4	1.1%	\$156
5	0.8%	\$80
6	1.0%	\$92
7	1.0%	\$63
8	1.6%	\$177
9	1.6%	\$259
10	1.5%	\$253
11	1.3%	\$409
12	1.6%	\$347
13	1.2%	\$400
14	1.4%	\$404
15	0.9%	\$400
16	0.9%	\$261
Weighted Statewide	1.3%	\$219

11.2.4 Roof Reflectance and Roof Deck Insulation

The project team performed insulation runs with higher reflectance roof tiles with values, 0.35 and 0.55, in comparison to the prescriptive requirements of 0.20 for CZ 10-15 for steep slope roofs. The results show that increasing the reflectance level yields approximately 2% and 4.7% TDV savings, respectively.

The combination of higher reflectance tiles and roof deck insulation does provide additional savings. Thus it is possible to mix and match the two measures to meet specific energy reduction goals as long as the measures are cost-effective.

Case 1	0.35 Roof Reflectance
Case 2	0.55 Roof Reflectance
Case 3	0.35 Roof Reflectance + R8 Above Deck
Case 4	0.55 Roof Reflectance + R8 Above Deck
Case 5	0.35 Roof Reflectance + R13 Below Deck

	% TDV Savings: (Baseline - Proposed)/Baseline							
		70 IDV Saving			G 5			
			Case 3.	Case 4.	Case 5.			
Climate	Case 1.	Case 2.	0.35 reflectance	0.55 reflectance	0.35 reflectance			
Zone	0.35 reflectance	0.55 reflectance	with R8 above	with R8 above	with R13 below			
			deck	deck	deck			
1	-5.0%	-8.7%	0.5%	-1.8%	-0.2%			
2	-4.1%	-7.4%	1.9%	-0.3%	1.5%			
3	-5.3%	-8.5%	0.0%	-1.9%	-0.6%			
4	-2.2%	-3.3%	5.8%	4.2%	5.3%			
5	-7.0%	-11.8%	-1.1%	-3.9%	-1.8%			
6	-1.9%	-3.7%	4.9%	3.3%	4.0%			
7	-1.5%	-4.5%	1.8%	0.0%	1.2%			
8	6.6%	10.2%	16.0%	17.0%	14.7%			
9	6.3%	11.1%	17.5%	19.2%	16.0%			
10	3.3%	8.5%	14.8%	16.7%	13.2%			
11	1.9%	6.0%	11.7%	13.3%	10.2%			
12	2.2%	6.1%	13.0%	14.4%	11.5%			
13	2.0%	6.6%	12.7%	14.6%	11.4%			
14	1.4%	4.8%	10.4%	11.8%	9.0%			
15	2.0%	6.7%	11.4%	14.0%	10.1%			
16	-0.6%	-1.7%	5.8%	4.9%	5.2%			
Weighted Statewide	1.9%	4.7%	11.4%	12.2%	10.1%			

	Present Value Energy Cost Savings							
Climate Zone	Case 1. 0.35 reflectance	Case 2. 0.55 reflectance	Case 3. 0.35 reflectance with R8 above deck	Case 4. 0.55 reflectance with R8 above deck	Case 5. 0.35 reflectance with R13 below deck			
1	(\$923)	(\$1,598)	\$84	(\$327)	\$ (30)			
2	(\$630)	(\$1,137)	\$295	(\$50)	\$ 235			
3	(\$581)	(\$935)	(\$3)	(\$211)	\$ (60)			
4	(\$311)	(\$452)	\$808	\$580	\$ 735			
5	(\$692)	(\$1,173)	(\$108)	(\$389)	\$ (177)			
6	(\$166)	(\$325)	\$437	\$292	\$ 355			
7	(\$97)	(\$290)	\$113	(\$3)	\$ 78			
8	\$714	\$1,106	\$1,742	\$1,848	\$ 1,595			
9	\$1,038	\$1,834	\$2,896	\$3,176	\$ 2,647			
10	\$565	\$1,464	\$2,552	\$2,882	\$ 2,275			
11	\$583	\$1,871	\$3,617	\$4,135	\$ 3,159			
12	\$459	\$1,300	\$2,759	\$3,050	\$ 2,433			
13	\$651	\$2,109	\$4,084	\$4,675	\$ 3,649			
14	\$399	\$1,402	\$3,064	\$3,472	\$ 2,652			
15	\$918	\$3,089	\$5,227	\$6,445	\$ 4,658			
16	(\$159)	(\$468)	\$1,605	\$1,360	\$ 1,440			
Weighted Statewide	\$318	\$776	\$1,892	\$2,028	\$ 1,685			

As seen above, while higher reflectance tiles save energy, they are cost effective in only the cooling climates in California whereas a combination of higher reflectance tiles and R 13 below-roof deck insulation is cost-effective in all climate zones.

11.3 HPA Measure Package

This section presents the % TDV savings and associated cost savings from combining the individual HPA measures presented previously. Overall, layering the deck insulation, duct insulation and leakage measures bring additional average statewide TDV savings on the order of 1.6 to 2.0% in comparison to installing just the deck insulation.

The section presents results from four scenarios for HPA measure combinations with roof deck insulation level as the main variable, as shown in the table below.

	Roof Deck Insulation	Duct Insulation	Duct Leakage
HPA Combo Set #1	R-8 above	R-8	8%, 6% and 4%
HPA Combo Set #2	R-6 above	R-8	8%, 6% and 4%
HPA Combo Set #3	R-4 above	R-8	8%, 6% and 4%
HPA Combo Set #4	R-11 below	R-8	8%, 6% and 4%

As anticipated, combo set #1 with R-8 above-deck insulation is the highest performing package. This confirms the findings from the individual measure runs that roof deck insulation level is the dominant measure with the most energy impact of the HPA measures investigated. The packages with greater above-deck insulation values performs better. R-11 below-deck insulation combination performance is on par with the R-4 above-deck combo set results⁴⁵. Above-deck insulation is more effective (in comparison to below-deck insulation with the same R value) because the effective R value for below-deck insulation is discounted by the deck framing members or trusses.

Within each combo set with the same roof deck insulation level, the runs with the lowest duct leakage level performs around 1% better than the default 8% leakage runs. We formatted the tables to make trends more visible to the readers. These formats and their meanings are:

- Conditional color formatting shows performance trends between climate zones
- **Bold** entry denotes the highest performing package and climate zone for each set
- *Italic* entry denotes the lowest performing package and climate zone for each set

⁴⁵ For example, weighted average % TDV savings for R-11 below-deck and R-4 above-deck (both with R-8 duct and 4% duct leakage) are both 10.5%, though the performance levels for each climate zone is different.

11.3.1 R-8 Above Deck Insulation + Higher Duct Insulation + Lower Leakage

Case 1	R8 Ducts + 8% Duct Leakage + R8 Above Deck
Case 2	R8 Ducts + 6% Duct Leakage + R8 Above Deck
Case 3	R8 Ducts + 4% Duct Leakage + R8 Above Deck

	% TDV Savings: (Baseline - Proposed)/Baseline						
Climate Zone	Case 1	Case 2	Case 3				
1	7.2%	7.7%	8.2%				
2	8.4%	8.8%	9.3%				
3	5.9%	6.2%	6.6%				
4	9.9%	10.3%	10.7%				
5	5.8%	6.1%	6.4%				
6	8.1%	8.3%	8.6%				
7	4.3%	4.3%	4.4%				
8	15.1%	15.4%	15.7%				
9	16.7%	17.2%	17.8%				
10	15.2%	15.7%	16.2%				
11	11.9%	12.6%	13.4%				
12	14.4%	14.9%	15.5%				
13	14.1%	14.8%	15.5%				
14	10.7%	11.5%	12.3%				
15	12.1%	12.9%	13.7%				
16	8.8%	9.4%	10.0%				
Weighted Statewide	12.7%	13.3%	13.8%				

11.3.2 R-6 Above Deck Insulation + Higher Duct Insulation + Lower Leakage

Case 1	R8 Ducts + 8% Duct Leakage + R6 Above Deck
Case 2	R8 Ducts + 6% Duct Leakage + R6 Above Deck
Case 3	R8 Ducts + 4% Duct Leakage + R6 Above Deck

% TDV Savings: (Baseline - Proposed)/Baseline Climate Case 1 Case 2 Case 3 Zone 1 7.3% 6.2% 6.8% 2 7.3% 7.8% 8.3% 3 5.1% 5.5% 5.8% 4 8.7% 9.2% 9.6% 5 5.0% 5.4% 5.7% 6 7.0% 7.5% 7.3% 7 3.9% 4.1% 3.9% 8 13.6% 13.9% 14.2% 9 14.9% 15.5% 16.1% 10 13.5% 14.1% 14.6% 11 10.4% 11.2% 12.0% 12 12.7% 13.3% 13.9% 13 14.0% 12.5% 13.3% 14 9.3% 10.2% 11.0% 15 10.4% 11.2% 12.1% 16 7.5% 8.2% 8.8% Weighted Statewide 11.3% 11.8% 12.4%

11.3.3 R-4 Above Deck Insulation + Higher Duct Insulation + Lower Leakage

Case 1	R8 Ducts + 8% Duct Leakage + R4 Above Deck
Case 2	R8 Ducts + 6% Duct Leakage + R4 Above Deck
Case 3	R8 Ducts + 4% Duct Leakage + R4 Above Deck

	% TDV Savings:	% TDV Savings: (Baseline - Proposed)/Baseline						
Climate Zone	Case 1	Case 2	Case 3					
1	5.0%	5.6%	6.2%					
2	6.0%	6.5%	7.0%					
3	4.1%	4.5%	4.9%					
4	7.2%	7.7%	8.1%					
5	4.0%	4.4%	4.7%					
6	5.7%	6.0%	6.3%					
7	3.2%	3.3%	3.4%					
8	11.3%	11.7%	12.0%					
9	12.4%	13.0%	13.7%					
10	11.2%	11.8%	12.4%					
11	8.3%	9.2%	10.0%					
12	10.4%	11.0%	11.7%					
13	10.4%	11.2%	12.0%					
14	7.4%	8.3%	9.2%					
15	8.1%	9.0%	10.1%					
16	5.8%	6.5%	7.3%					
Weighted Statewide	9.2%	9.8%	10.5%					

11.3.4 R-11 Below Deck Insulation + Higher Duct Insulation + Lower Leakage

Case 1	R8 Ducts + 8% Duct Leakage + R11 Below Deck
Case 2	R8 Ducts + 6% Duct Leakage + R11 Below Deck
Case 3	R8 Ducts + 4% Duct Leakage + R11 Below Deck

	% TDV Savings: (Baseline - Proposed)/Baseline						
Climate Zone	Case 1	Case 2	Case 3				
1	6.4%	6.9%	7.4%				
2	7.3%	7.8%	8.2%				
3	5.1%	5.4%	5.8%				
4	8.5%	8.9%	9.3%				
5	4.9%	5.2%	5.5%				
6	6.4%	6.8%	7.0%				
7	3.4%	3.5%	3.6%				
8	12.4%	12.8%	13.0%				
9	13.8%	14.4%	15.0%				
10	12.5%	13.0%	13.5%				
11	9.4%	10.2%	11.0%				
12	11.7%	12.2%	12.8%				
13	11.8%	12.5%	13.2%				
14	8.4%	9.3%	10.1%				
15	9.9%	10.7%	11.5%				
16	7.5%	8.2%	8.8%				
Weighted Statewide	9.2%	9.8%	10.5%				

12. APPENDIX E: DCS AND HPA COST-EFFECTIVENESS COMPARISON

This section displays the comparative energy performance and life cycle costs results for representative scenarios. These scenarios were selected to cover the DCS and HPA cases investigated by the Statewide CASE Team. The table below provides the categories of scenarios included in this section and associated details:

Scenario	Description	Details
Case 1 and 2	DCS and DCS verified	DCS with vented attic, with and without duct leakage to outdoor HERS verification
Case 3-5	DCS unvented attic	DCS with unvented attic, with different roof deck insulation and envelope tightness levels
Case 6 and 7	HPA deck insulation only	HPA with deck insulation, below-deck or above-deck
Case 5-10	HPA combinations	HPA combinations with various above- and below-deck insulation levels

Overall, R13 below roof deck insulation is the measure with the most cost-effective savings across the state – the measure is cost-effective in climate zones 1, 2, 4, 8-16. As the rest of this section will illustrate, to achieve equivalent savings to R13 below deck with DCS measures, it is necessary to have a HERS verified ducts in conditioned space installation.

The rest of the section consist of a series of tables that provide climate zone specific, detailed results on the following quantities for all ten scenarios:

- Energy savings per square foot prototype building area
- Percentage TDV energy savings
- Present value of energy cost savings in \$
- Measure/package first cost in \$
- Life cycle cost (cost minus benefit)
- Percentage savings compared to R-13 Below-deck Insulation case

	Savings (Baseline - Proposed) in TDV kBTU/ft ²									
	Case 1	Case 2	Case 3	Case 4	Case 5	Case 6	Case 7	Case 8	Case 9	Case 10
	Ducts	Verified	R30 + No	R38+ No	R38 + No	R13 Below	R6 Above	R11 Below	R6 Above	R8 Above
	located	low-leakage	RB + No	RB + No	RB + No	Deck (No	Deck	Deck + R8	Deck + R8	Deck + R8
Climate	entirely in	ducts	WHF +	WHF +	WHF +	RB)		Ducts + 4%	Ducts + 4%	Ducts + 4%
Zone	conditioned	entirely in	Ducts in	Ducts in	Ducts in			Duct	Duct	Duct
	space	conditioned space	attic	attic	attic + 3.25ACH50			Leakage	Leakage	Leakage
1	3.7	5.1	3.3	4.2	5.4	2.7	2.4	3.2	3.2	3.6
2	2.5	3.6	2.5	3.4	4.2	2.4	2.5	3.0	3.0	3.4
3	1.6	2.1	1.2	1.8	2.4	1,1	1.2	1.5	1.5	1.7
4	2.9	3.8	2.5	3.4	4.1	2.5	2.6	3.1	3.2	3.5
5	1.2	1.6	0.9	1.3	2.0	1.0	1.1	1.3	1.3	1.5
6	1.3	1.6	0.9	1.3	1.6	1.2	1.4	1.5	1.6	1.8
7	0.4	0.5	0.0	0.3	0.4	0.5	0.6	0.6	0.6	0.7
8	2.0	2.7	-0.1	0.8	1.0	3.1	3.4	3.4	3.7	4.1
9	4.2	5.8	2.4	3.8	4.2	5.2	5.6	5.9	6.3	7.0
10	4.5	6.0	2.5	3.7	4.3	4.8	5.2	5.6	6.0	6.6
11	7.4	11.1	5.2	7.3	8.6	7.0	7.7	8.1	8.8	9.9
12	5.5	7.5	1.6	3.3	4.2	5.4	5.9	6.5	7.0	7.8
13	8.9	12.9	7.1	9.2	10.3	8.3	8.8	10.1	10.7	11.9
14	7.1	10.6	4.8	6.8	8.5	5.9	6.5	7.1	7.7	8.6
15	9.6	17.1	11.3	13.8	15.3	10.9	11.4	12.5	13.2	15.0
16	6.1	8.8	5.9	7.5	9.2	5.4	4.9	5.8	5.8	6.6
Weighted Statewide	4.8	6.9	3.1	4.5	5.3	4.9	4.2	5.7	6.1	6.8

				% TDV Sa	vings: (Baselin	ne - Proposed)/	Baseline ⁴⁶			
Climate Zone	Ducts located entirely in conditioned space	Verified low-leakage ducts entirely in conditioned space	R30 + No RB + No WHF + Ducts in attic	R38+ No RB + No WHF + Ducts in attic	R38 + No RB + No WHF + Ducts in attic + 3.25ACH50	R13 Below Deck (No RB)	R6 Above Deck	R11 Below Deck + R8 Ducts + 4% Duct Leakage	R6 Above Deck + R8 Ducts + 4% Duct Leakage	R8 Above Deck + R8 Ducts + 4% Duct Leakage
1	8.4%	11.6%	7.5%	9.6%	12.4%	6.2%	5.5%	7.4%	7.3%	8.2%
2	7.0%	9.9%	6.9%	9.3%	11.5%	6.6%	6.8%	8.2%	8.3%	9.3%
3	6.0%	8.1%	4.7%	6.7%	9.2%	4.4%	4.5%	5.8%	5.8%	6.6%
4	8.8%	11.5%	7.6%	10.3%	12.4%	7.7%	8.0%	9.3%	9.6%	10.7%
5	5.0%	7.0%	3.7%	5.7%	8.7%	4.2%	4.6%	5.5%	5.7%	6.4%
6	6.0%	7.8%	4.1%	6.4%	7.8%	5.8%	6.6%	7.0%	7.5%	8.6%
7	2.5%	3.2%	0.0%	1.9%	2.5%	3.1%	3.7%	3.6%	4.1%	4.4%
8	7.9%	10.3%	-0.4%	3.2%	4.0%	11.9%	13.0%	13.0%	14.2%	15.7%
9	10.6%	14.6%	6.1%	9.7%	10.7%	13.1%	14.1%	15.0%	16.1%	17.8%
10	10.8%	14.6%	6.1%	9.1%	10.4%	11.7%	12.6%	13.5%	14.6%	16.2%
11	10.0%	15.0%	7.1%	9.8%	11.6%	9.5%	10.4%	11.0%	12.0%	13.4%
12	11.0%	14.8%	3.3%	6.6%	8.4%	10.8%	11.8%	12.8%	13.9%	15.5%
13	11.6%	16.9%	9.3%	12.1%	13.4%	10.9%	11.6%	13.2%	14.0%	15.5%
14	10.2%	15.1%	6.9%	9.7%	12.1%	8.5%	9.3%	10.1%	11.0%	12.3%
15	8.8%	15.7%	10.3%	12.6%	14.0%	10.0%	10.4%	11.5%	12.1%	13.7%
16	9.2%	13.4%	8.9%	11.4%	14.0%	8.2%	7.5%	8.8%	8.8%	10.0%

⁴⁶ Conditional color formatting shows performance trends between climate zones; **Bold** entry denotes the highest performing package and climate zone for each set; *Italic* entry denotes the lowest performing package and climate zone for each set

Weighted Statewide	10.0%	14.3%	6.4%	9.3%	10.9%	10.1%	10.8%	11.8%	12.7%	14.1%
2000 11100	10.076	14.370	0.470	1	PV of Energy (11.0/0	12.7/0	14.170
Climate Zone	Ducts located entirely in conditioned space	Verified low-leakage ducts entirely in conditioned space	R30 + No RB + No WHF + Ducts in attic	R38+ No RB + No WHF + Ducts in attic	R38 + No RB + No WHF + Ducts in attic + 3.25ACH50	R13 Below Deck (No RB)	R6 Above Deck	R11 Below Deck + R8 Ducts + 4% Duct Leakage	R6 Above Deck + R8 Ducts + 4% Duct Leakage	R8 Above Deck + R8 Ducts + 4% Duct Leakage
1	\$1,543	\$2,135	\$1,375	\$1,752	\$2,270	\$1,129	\$1,000	\$1,361	\$1,343	\$1,505
2	\$1,067	\$1,514	\$1,063	\$1,425	\$1,769	\$1,011	\$1,037	\$1,257	\$1,268	\$1,419
3	\$654	\$883	\$518	\$736	\$1,002	\$478	\$494	\$630	\$636	\$721
4	\$1,213	\$1,593	\$1,052	\$1,420	\$1,718	\$1,063	\$1,109	\$1,288	\$1,327	\$1,484
5	\$499	\$689	\$364	\$563	\$857	\$421	\$453	\$548	\$560	\$634
6	\$535	\$692	\$366	\$564	\$689	\$518	\$580	\$619	\$668	\$759
7	\$163	\$203	\$1	\$120	\$162	\$198	\$235	\$233	\$261	\$283
8	\$856	\$1,125	(\$44)	\$350	\$434	\$1,295	\$1,413	\$1,419	\$1,545	\$1,713
9	\$1,750	\$2,426	\$1,017	\$1,604	\$1,776	\$2,174	\$2,337	\$2,482	\$2,663	\$2,948
10	\$1,872	\$2,524	\$1,048	\$1,563	\$1,793	\$2,023	\$2,184	\$2,335	\$2,523	\$2,794
11	\$3,099	\$4,656	\$2,202	\$3,054	\$3,614	\$2,956	\$3,221	\$3,403	\$3,711	\$4,146
12	\$2,322	\$3,140	\$692	\$1,401	\$1,777	\$2,290	\$2,494	\$2,716	\$2,938	\$3,282
13	\$3,736	\$5,433	\$2,981	\$3,877	\$4,310	\$3,503	\$3,719	\$4,236	\$4,502	\$4,987
14	\$3,004	\$4,446	\$2,037	\$2,851	\$3,572	\$2,497	\$2,749	\$2,964	\$3,240	\$3,616
15	\$4,040	\$7,194	\$4,746	\$5,795	\$6,447	\$4,600	\$4,773	\$5,272	\$5,547	\$6,289
16	\$2,552	\$3,705	\$2,469	\$3,156	\$3,887	\$2,270	\$2,067	\$2,437	\$2,442	\$2,776

Weighted Statewide	\$2,031	\$2,901	\$1,307	\$1,889	\$2,216	\$2,048	\$2,189	\$2,402	\$2,569	\$2,863
					Measure F	irst Cost (\$)				
Climate Zone	Ducts located entirely in conditioned space	Verified low-leakage ducts entirely in conditioned space	R30 + No RB + No WHF + Ducts in attic	R38+ No RB + No WHF + Ducts in attic	R38 + No RB + No WHF + Ducts in attic + 3.25ACH50	R13 Below Deck (No RB)	R6 Above Deck	R11 Below Deck + R8 Ducts + 4% Duct Leakage	R6 Above Deck + R8 Ducts + 4% Duct Leakage	R8 Above Deck + R8 Ducts + 4% Duct Leakage
1	\$ 865	\$ 990	\$ 1,935	\$ 2,495	\$ 2,495	\$ 589	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
2	\$ 865	\$ 990	\$ 2,196	\$ 2,757	\$ 2,757	\$ 831	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
3	\$ 865	\$ 990	\$ 2,196	\$ 2,757	\$ 2,757	\$ 831	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
4	\$ 865	\$ 990	\$ 2,196	\$ 2,757	\$ 2,757	\$ 831	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
5	\$ 865	\$ 990	\$ 2,196	\$ 2,757	\$ 2,757	\$ 831	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
6	\$ 865	\$ 990	\$ 2,196	\$ 2,757	\$ 2,757	\$ 831	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
7	\$ 865	\$ 990	\$ 2,196	\$ 2,757	\$ 2,757	\$ 831	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
8	\$ 865	\$ 990	\$ 2,196	\$ 2,757	\$ 2,757	\$ 831	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
9	\$ 865	\$ 990	\$ 2,196	\$ 2,757	\$ 2,757	\$ 831	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
10	\$ 865	\$ 990	\$ 2,196	\$ 2,757	\$ 2,757	\$ 831	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
11	\$ 865	\$ 990	\$ 1,935	\$ 2,495	\$ 2,495	\$ 589	\$ 1,467	\$ 722	\$ 1,458	\$ 1,896
12	\$ 865	\$ 990	\$ 1,935	\$ 2,495	\$ 2,495	\$ 589	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
13	\$ 865	\$ 990	\$ 1,935	\$ 2,495	\$ 2,495	\$ 589	\$ 1,467	\$ 886	\$ 1,622	\$ 2,060
14	\$ 865	\$ 990	\$ 1,935	\$ 2,495	\$ 2,495	\$ 670	\$ 1,467	\$ 803	\$ 1,458	\$ 1,896
15	\$ 865	\$ 990	\$ 1,935	\$ 2,495	\$ 2,495	\$ 589	\$ 1,467	\$ 722	\$ 1,458	\$ 1,896
16	\$ 865	\$ 990	\$ 1,935	\$ 2,495	\$ 2,495	\$ 670	\$ 1,467	\$ 803	\$ 1,458	\$ 1,896

					Life Cycle	Cost (\$) ⁴⁷				
Climate Zone	Ducts located entirely in conditioned space	Verified low-leakage ducts entirely in conditioned space	R30 + No RB + No WHF + Ducts in attic	R38+ No RB + No WHF + Ducts in attic	R38 + No RB + No WHF + Ducts in attic + 3.25ACH50	R13 Below Deck (No RB)	R6 Above Deck	R11 Below Deck + R8 Ducts + 4% Duct Leakage	R6 Above Deck + R8 Ducts + 4% Duct Leakage	R8 Above Deck + R8 Ducts + 4% Duct Leakage
1	\$ (678)	\$ (1,145)	\$ 560	\$ 743	\$ 225	\$ (540)	\$ 467	\$ (475)	\$ 279	\$ 555
2	\$ (202)	\$ (524)	\$ 1,132	\$ 1,332	\$ 988	\$ (180)	\$ 430	\$ (371)	\$ 354	\$ 642
3	\$ 211	\$ 107	\$ 1,678	\$ 2,021	\$ 1,755	\$ 353	\$ 974	\$ 256	\$ 986	\$ 1,340
4	\$ (348)	\$ (603)	\$ 1,144	\$ 1,337	\$ 1,039	\$ (232)	\$ 358	\$ (402)	\$ 295	\$ 576
5	\$ 366	\$ 301	\$ 1,832	\$ 2,194	\$ 1,899	\$ 410	\$ 1,015	\$ 338	\$ 1,062	\$ 1,427
6	\$ 330	\$ 298	\$ 1,829	\$ 2,193	\$ 2,068	\$ 314	\$ 887	\$ 268	\$ 954	\$ 1,302
7	\$ 702	\$ 787	\$ 2,195	\$ 2,637	\$ 2,595	\$ 633	\$ 1,232	\$ 653	\$ 1,361	\$ 1,777
8	\$ 9	\$ (135)	\$ 2,240	\$ 2,407	\$ 2,323	\$ (464)	\$ 54	\$ (533)	\$ 78	\$ 347
9	\$ (885)	\$ (1,436)	\$ 1,179	\$ 1,153	\$ 981	\$ (1,343)	\$ (870)	\$ (1,596)	\$ (1,041)	\$ (888)
10	\$ (1,007)	\$ (1,534)	\$ 1,148	\$ 1,193	\$ 963	\$ (1,192)	\$ (717)	\$ (1,449)	\$ (901)	\$ (734)
11	\$ (2,234)	\$ (3,666)	\$ (268)	\$ (559)	\$ (1,119)	\$ (2,367)	\$ (1,753)	\$ (2,680)	\$ (2,253)	\$ (2,250)
12	\$ (1,457)	\$ (2,150)	\$ 1,243	\$ 1,094	\$ 718	\$ (1,701)	\$ (1,027)	\$ (1,830)	\$ (1,316)	\$ (1,222)
13	\$ (2,871)	\$ (4,443)	\$ (1,046)	\$ (1,381)	\$ (1,814)	\$ (2,914)	\$ (2,252)	\$ (3,350)	\$ (2,880)	\$ (2,926)
14	\$ (2,139)	\$ (3,456)	\$ (103)	\$ (355)	\$ (1,077)	\$ (1,828)	\$ (1,281)	\$ (2,161)	\$ (1,782)	\$ (1,720)

 $^{^{\}rm 47}$ Negative LCC numbers indicates that the scenario is cost-effective in the CZ.

15	\$ (3,175)	\$ (6,204)	\$ (2,811)	\$ (3,300)	\$ (3,951)	\$ (4,011)	\$ (3,306)	\$ (4,550)	\$ (4,089)	\$ (4,393)
16	\$ (1,687)	\$ (2,715)	\$ (534)	\$ (661)	\$ (1,391)	\$ (1,601)	\$ (599)	\$ (1,635)	\$ (984)	\$ (880)

		Percent Savings (%) Compared to R13 Below Roof Deck ⁴⁸									
Climate Zones	Ducts located entirely in conditioned space	Verified low-leakage ducts entirely in conditioned space	R30 + No RB + No WHF + Ducts in attic	R38+ No RB + No WHF + Ducts in attic	R38 + No RB + No WHF + Ducts in attic + 3.25ACH50	R13 Below Deck (No RB)	R6 Above Deck	R11 Below Deck + R8 Ducts + 4% Duct Leakage	R6 Above Deck + R8 Ducts + 4% Duct Leakage	R8 Above Deck + R8 Ducts + 4% Duct Leakage	
1	2.3%	5.5%	1.3%	3.4%	6.2%	0.0%	-0.7%	1.3%	1.2%	2.1%	
2	0.4%	3.3%	0.3%	2.7%	4.9%	0.0%	0.2%	1.6%	1.7%	2.7%	
3	1.6%	3.7%	0.4%	2.4%	4.8%	0.0%	0.1%	1.4%	1.5%	2.2%	
4	1.1%	3.8%	-0.1%	2.6%	4.7%	0.0%	0.3%	1.6%	1.9%	3.0%	
5	0.8%	2.7%	-0.6%	1.4%	4.4%	0.0%	0.3%	1.3%	1.4%	2.2%	
6	0.2%	2.0%	-1.7%	0.5%	1.9%	0.0%	0.7%	1.1%	1.7%	2.7%	
7	-0.5%	0.1%	-3.1%	-1.2%	-0.6%	0.0%	0.6%	0.5%	1.0%	1.3%	
8	-4.0%	-1.6%	-12.3%	-8.7%	-7.9%	0.0%	1.1%	1.1%	2.3%	3.8%	
9	-2.6%	1.5%	-7.0%	-3.4%	-2.4%	0.0%	1.0%	1.9%	2.9%	4.7%	
10	-0.9%	2.9%	-5.6%	-2.7%	-1.3%	0.0%	0.9%	1.8%	2.9%	4.5%	
11	0.5%	5.5%	-2.4%	0.3%	2.1%	0.0%	0.9%	1.4%	2.4%	3.8%	
12	0.2%	4.0%	-7.5%	-4.2%	-2.4%	0.0%	1.0%	2.0%	3.1%	4.7%	
13	0.7%	6.0%	-1.6%	1.2%	2.5%	0.0%	0.7%	2.3%	3.1%	4.6%	
14	1.7%	6.6%	-1.6%	1.2%	3.7%	0.0%	0.9%	1.6%	2.5%	3.8%	

⁴⁸ Green cells denotes better performance and Red cells denote worse performance than the R13 Below-Deck (No RB) comparison baseline; White cells are within 1% better.

15	-1.2%	5.7%	0.3%	2.6%	4.0%	0.0%	0.4%	1.5%	2.1%	3.7%
16	1.0%	5.2%	0.7%	3.2%	5.8%	0.0%	-0.7%	0.6%	0.6%	1.8%



13. APPENDIX F: ROOF COVERING AND ROOF DECK INSULATION FIRE RATING REQUIREMENTS

During the stakeholder engagement process, stakeholders raised concerns and the Statewide CASE Team investigated the topic of whether and how having above deck insulation would affect the fire rating of roof covering products. This appendix describes the fire rating requirements for roof covering products, for roof deck insulation based on the Statewide CASE Team's research, discussions with industry stakeholders and feedback from the California Fire Marshal Office

13.1 Roof Covering Fire Rating

Roof covering products are current rated to class A/B/C based on the ASTM E108 [NFPA 256, UL790] test. The test is a laboratory test which places a block of "burning brand" wooden block on top of the roof assembly to simulate the effect of a fire originating from outside the building. The rating for a particularly roof covering is specific to the slope of the roof and maximum insulation thickness (if applicable) are both factors that affect the fire performance of the roof assembly. According to industry feedback through the CASE process, roof covering manufacturers currently rate their products with the configuration of placing roof covering directly on the test roof deck (as opposed to adding an insulation layer).

Under current building code requirement, tile roof products are automatically rated Class A. Chapter 15 in the California Building Code (and International Building Code section 1505 for Fire Classification) specify that certain roofing materials are Class A without having to test to ASTEM E108. These materials include slate, clay, concrete roof tile, an exposed concrete roof deck, and ferrous and copper shingles.

13.2 Plastic Roof Deck Insulation Fire Rating

Insulation products are subject to a different fire test from roof covering products. California Building Code (and International Building Code section 2603 for Foam Plastic Insulation) require foam plastic insulation to be tested to demonstrate flame spreads index of not more than 75 and a smoke-developed index of not more than 450 according to ASTM E84 [UL723]. The requirements are applicable to roof insulation products, including XPS/ polyiso/ polyurethane above-deck insulation and SPF below-deck insulation products. The Statewide CASE Team collected product literature to understand and verify how these insulation products currently demonstrate compliance the regulations. Product literatures for plastic foam insulation products from the following product categories and manufacturers/brands were reviewed, and all of them have publicly available ICC-ES (Evaluation Services) Evaluation Reports and disclose the flame spread and smoke-developed indices in product specification list.

- Polystyrene: XPS brands Dow and Owens Corning; EPS brand InsulFoam.
- Polyiso/Polyurethane: JM, GAF, Rmax and Firestone.

In summary, plastic roof deck insulation does not adhere to the same fire rating test as roof covering materials. However, the Statewide CASE Team did find one polyiso foam board products literature that claims to have tested their products to obtain Class A rating status. For this product, the maximum slope allowed were in the range of ½:12 to 1:12, so it is essentially only for flat roofs (more common in commercial than residential application).

13.3 Impact of Above Deck Insulation on Roof Assembly Fire Rating

The Statewide CASE Team looked into the fire ratings issue and consulted with a representative in the California State Fire Marshall office (Kevin Reinertsen - Division Chief). Here are the key points from our discussions:

- Roof covering (tiles, shingles) test (ASTM E108/UL790) that results in class A/B/C ratings are done with specific roof assemblies, and ratings are only valid when the installation is the same as the assembly as rated.
- Q: "If roof covering is class A, and the rigid insulation is also rated satisfactorily (ASTM E84 for flame spread and smoke developed indices), does that imply the assembly satisfies fire rating requirement? " (Fire rated + fire rated = fire rated?)

 Answer: One would think so, but this is not quite the case. In his opinion, the roof coverings need to be rated/certified again when you add above-deck insulation to reflect the change in assembly. Mr. Reinertsen said that these tests cost on the order of \$20,000 for each assembly.
- Q; "who will bear this cost?"

 Answer: Mr. Reinertsen thinks that roof manufacturers (and perhaps partnering with rigid foam manufacturers) would be the ones forking out for the tests, and some of them might even see it as a market advantage.
- Mr. Reinertsen recommends for the Statewide CASE Team to make sure to reference the appropriate CBC in the Part 6 requirements, if we are proposing a decrease in roof assembly U factor that may get builders to consider installing rigid foam above deck.
- Mr. Reinertsen also confirmed that insulation installed below roof deck would not trigger fire concerns.

The Statewide CASE Team also have discussions with industry stakeholder Rick Olson from the Tile Roofing Institute who confirmed these findings.

13.4 Summary of Fire Tests

ASTM E108 [NFPA 256, UL790], Fire Tests of Roof Coverings⁴⁹

Combustibility is determined on all components of the roof assembly as a composite. The test includes three parts:

- · Spread of flame
- Intermittent flame
- Burning brand

The spread of flame is the only test conducted on roof assemblies with concrete, steel or gypsum decks (non-combustible), while all three tests are performed on assemblies incorporating combustible (wood, plank, plywood, or plastic foam) roof decks.

ASTM E84 [UL 723 or NFPA 255], Surface Burning Characteristics of Building Materials⁵⁰

Often referred to as the "Steiner Tunnel Test," E84 is a standard method to assess the spread of fire on the surface of a material. A sample about 20 inches wide and 25 feet long is installed on the ceiling of a horizontal test chamber. The material is exposed to a 4-foot long gas flame at one end of the tunnel for a period of 10 minutes. Threat of flame front 2 progression on the material is compared to a standard (inorganic reinforced cement board) and calculations are made to produce a flame spread rating (a unit-less number). Smoke from the fire in the tunnel is measured in the exhaust stack by using a light beam to evaluate smoke developed ratings.

Since E84 is a standard laboratory fire test on a single material, numerical ratings derived from E84 are not intended to reflect hazards presented by the test material under actual fire conditions.

13.5 Examples of ICC-ES Evaluation Reports

The Statewide CASE Team reviewed a number of ICC-ES product evaluation reports to understand the fire rating requirements and results associated with roof deck insulation products. A few examples for the common insulation types are presented below to illustrate the type of information provided in these reports. The Statewide CASE Team accessed the reports presented below from ICC-ES's website directly, under various sections under Division 07 00 00 for Thermal and Moisture Protection products. ⁵¹

Polyiso Rigid Foam Example - ESR-3398⁵²

This report is for two similar polyiso rigid foams products with different facing materials. The front section of the report clearly points out the code version (year published) and sections for

⁴⁹ http://www.astm.org/DATABASE.CART/HISTORICAL/E108-00.htm

⁵⁰ http://www.astm.org/Standards/E84.htm

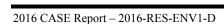
⁵¹ http://www.icc-es.org/Reports/index.cfm?csi_id=302&view_details

⁵² http://www.icc-es.org/Reports/pdf files/ESR-3398.pdf

which the products were tested to be in compliance. The evaluation report provides details on product Descriptions (Section 3). The descriptions include product physical specifications, thermal resistance values from testing, air and vapor permeability levels from testing.

The report also offers associated Installation (Section 4) requirements for different product applications, such as for wall assemblies, crawl space and attic installations. Many of the installation instructions cite relevant International Residential Code sections and enable easy references to code requirements.

For this particularly product, the report provided installation details if the product was installed as a water-resistive barrier. Details included configuration and fastening method and proper treatment of joints and seams to achieve desired water-resistance properties. The report even listed example sheathing products (manufacturer, product type and corresponding ESR numbers) that may be used in conjunction to construct a water-resistance barrier.





Sections particularly relevant to the fire rating discussion include section 3.4 on "Surface-burning Characteristics." This sections displays the criteria indices and satisfactory thresholds as established by ASTM E84.

3.4 Surface-burning Characteristics:

The foam core of APTM Foil-Faced Sheathing has a flame-spread index of 25 or less and a smoke-developed index of 450 or less when tested in accordance with ASTM E84 at a maximum thickness of $4^{1}/_{2}$ inches (114 mm). The faced CI Max[®] Foam Sheathing has a flame-spread index of 25 or less and a smoke-developed index of 450 or less at a maximum thickness of 4 inches (102 mm).

Also, Section 4.3.2 points out the ignition barrier requirements when installing the evaluated/rated polyiso rigid foam product.

Polystyrene Rigid Foam Example – ESR - 1788⁵³

Similar to the polyiso example, the polystyrene rigid foam board report outlines the flame spread and smoke-developed indices from fire testing. The product table provides product density and thermal insulation value results from laboratory testing.



⁵³ http://www.icc-es.org/Reports/pdf files/ESR-1788.pdf

Close-Cell Spray Polyurethane Foam Example – ESR – 2670⁵⁴

The report identifies the chemical mixture components that makes up the product. The report covers requirements on ignition barrier and thermal barrier. In addition to the minimum required surface burning characteristics and the standard R value results, air and vapor permeability levels are provided as well.



This report provides extensive coverage on the conditions associated with product application. For example, the insulations shall be protected from the weather during application, and that the installer shall be certified by the manufacturer of applicable industry association. This

⁵⁴ http://www.icc-es.org/Reports/pdf files/ESR-2670.pdf

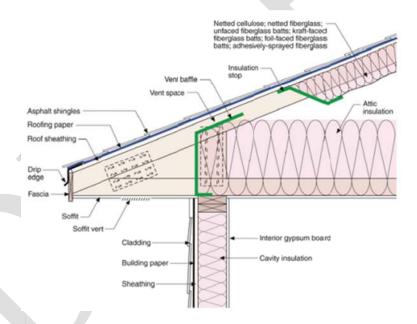
echoes feedback the Statewide CASE Team received from a spray foam manufacturer representative on their continuous efforts to standardize and unify the installer qualification certifications via industry alliance and associations.



14. APPENDIX G: ATTIC VENTILATION FOR HIGH PERFORMANCE ATTICS PACKAGE

The Statewide CASE Team code change proposal includes a prescriptive High Performance Attics (HPA) package that requires the installation of R-13 below-deck insulation in addition to R-38 ceiling insulation. When builders use the HPA package, the combination of below-deck insulation and ceiling insulation would cover the roof eaves and prevent the use of soffit or eave ventilation. This section presents some solutions to provide adequate attic ventilation and ensure an effective ceiling/roof assembly.

There are a number of ways to ensure proper attic ventilation rate without comprising the performance of ceiling and below-deck insulations. The schematic⁵⁵ below illustrates the use of a vent baffle in combination with an insulation stop. The use of vent baffles provides unobstructed ventilation channels between the two insulations and prevents flow under ceiling insulation. The insulation stops prevent air from directly blowing into below deck insulation.



This approach is relatively easy and practical to implement as use of baffles are already required when ceiling insulation is installed next to eave or soffit vents. The Residential Compliance Manual states that "there are a number of acceptable methods for maintaining

⁵⁵ "Hygrothermal Analysis of California Attics (RR-1110)." Prepared by Lstiburek, J. & C. Schumacher. http://www.buildingscience.com/documents/reports/rr-1110-hygrothermal-analysis-california-attics

ventilation air, including pre-formed baffles made of either cardboard or plastic. In some cases, plywood baffles are used." The photographs below showcase metal baffles and pre-fab vinyl baffles that are readily available in the market for this application.



Figure. Metal baffles (left) and Fre-fab baffle - Amerimax Home Product Accuvent Vinyl Airway and Soffit Vent (right)

A second approach to providing adequate attic ventilation when both below-deck and ceiling insulations are installed is to use gable end vents instead of soffit vents. The photograph below shows an attic with large gable end vents to provide the necessary attic ventilation rate. This eliminates the need for eave and soffit venting which requires additional installation details so they do not interfere with the attic insulation (in this case, the below deck unfaced fiberglass batts and blown-in fiberglass on the ceiling floor).



In the case that baffles and insulation stops or gable end vents are not desirable or compatible with individual building designs, there are a number of other ways to achieve similar performance as implementing the HPA package. Some alternatives include using above-deck

insulation or using cool roofs with higher reflectance level instead (of installing below-deck insulation).



15. APPENDIX H: COST METHODOLOGY AND RESULTS FOR OTHER DCS AND HPA MEASURES INVESTIGATED

The Statewide CASE Team performed building energy simulations and collected costs data associated with the DCS strategies and HPA measures laid out in Report Section 3. To keep the report succinct, only the results directly applicable to the proposed prescriptive requirements are included in subsequent report sections, Sections 4 and 5. This appendix displays the energy impacts and cost results from CASE efforts that are not already presented in Sections 4 and 5. The strategies included in this appendix include:

Ducts in Conditions Space (DCS)

• Ducts entirely in conditioned space (without HERS performance verification)

High Performance Attics (HPA)

- Duct Insulation
- Duct Leakage
- Roof Reflectance
- Raised Heel Truss
- Supply Duct Surface Area

15.1 Project-Level Construction Cost Results

The following table shows the <u>project level</u> incremental costs for the HPA components beyond the HPA package recommended in the main body of the report for code adoption.

Incremental Construction Cost - HPA components

Parameter	2100 sf prototype	2700 sf prototype	Notes
Raised Heel Truss	\$390	\$420	For a 12-14" heel. There is a lack of credible data points for this construction due to low implementation.
Duct Insulation	\$145	\$185	**Total costs can be reduced if implemented with reduced duct length/surface area
Duct Leakage	\$200	\$200	Cost for LLAH
Duct Surface Area	-\$50	-\$60	Cost savings for reducing duct insulation for each linear ft of duct included above.

The following three tables show the incremental <u>project</u> costs range for the DCS strategies beyond the DCS package recommended in the main body of the report for code adoption. These costs were calculated based on best estimates for the components involved in each strategy. The range of cost estimates represents the low and high values received from various sources, or when accounting for differences in materials, such as insulation type. Additionally, some DCS strategies have implications on building schedule and contractor coordination that cannot be fully captured in a component based estimate. These costs could be further reduced if HVAC equipment and duct work are downsized. With a DCS strategy, an HVAC contractor may install shorter duct runs as a direct result of having the dropped ceiling or plenum strategy. To be conservative, the project team did not include the benefits in our calculation of incremental costs here.

Of the 42 sources (16 of which were discussions with industry experts), only 12 provided cost estimates for these approaches. Many of these are very rough estimates, and some provided incomplete cost numbers or little information on how they were derived such that the Statewide CASE Team found it difficult to use them to calculate meaningful project incremental costs.

Incremental Construction Cost Range – DCS – Conditioned Plenum

Conditioned plenum	2100 sf prototype	2700 sf prototype	Notes
Material costs (lumber, air barrier (OSB), drywall) + labor	\$330 - \$640	\$220 - \$550	
Sealed combustion furnace	\$210 - \$360	\$210 - \$360	Average among varying capacities; condensing furnaces represent higher end of costs.
Interior Mechanical Closet	\$220- \$390	\$220- \$390	depends on location of closet (interior, attic, garage)
Total Costs	\$760 - \$1,390	\$650 - \$1,300	Standard ducts.
Weighted Total Cost	\$700	- \$1,340	Based on 44/55 prototype split

Incremental Construction Cost Range – DCS – Open Web Floor Truss

Open Web Floor Truss (only applies to 2-story model)	2700 sf prototype	Notes
Material costs (lumber, air barrier (OSB), drywall) + labor	\$0 - \$2,820	
Sealed combustion furnace	\$210 - \$360	Average among varying capacities; condensing furnaces represent higher end of costs.
Interior Mechanical Closet	\$220- \$390	depends on location of closet (interior, attic, garage)
Total Costs	\$420 - \$3,660	Standard ducts.

$Incremental\ Construction\ Cost\ Range-DCS-Unvented\ Attic$

Unvented Attic	2100 sf prototype	2700 sf prototype	Notes
Insulation + labor	\$2840 - \$11,670 best estimate: \$2,840	\$1,960 - \$8,060 best estimate: \$1,960	oc-SPF R30 to cc-SPF best est: cc-SPF R5 + R38 blown-in
Sealed furnace	\$210 - \$360	\$210 - \$360	Average among varying capacities; condensing furnaces represent higher end of costs.
Ignition barrier with SPF			Included with cost of SPF insulation
Eliminate Attic Venting	(\$550) - \$0 best estimate: (\$150)	(\$550) - \$0 best estimate: (\$150)	
Total Costs	\$2,490- \$12,030 (Best Est. \$2,900)	\$1,760- \$8,420 (Best Est. \$2,020)	Standard ducts.
Weighted Total Cost	Best estin	nate: \$2,420	Based on 44/55 prototype split

15.2 Per Unit Construction Cost Results

This section presents the results of cost data collection at the 'per unit' level for each of the components within HPA and DCS strategies. This section only presents results for those strategies that were considered but ultimately NOT chosen for the code recommendations in the main body of the report.

Per unit Incremental Construction Cost - HPA

HPA components	\$/unit	Addition al design	Additional training and coordination	Source
Above Deck Roof Insulation	$0.41^{a} - 6.00^{b}/ \text{ s.f.}$		X	Online Retailers; Stakeholder Interview
Counter Batten (Tile with above deck insulation)	\$0.10/s.f. roof			Stakeholder Interview
TOTAL for Above Deck Insulation ^a	\$0.51/s.f. roof			
Ceiling Insulation (R-38 in CZ 2-10)	\$0.14/s.f. ceiling			Online Retailers
Duct Insulation (R-8)	\$0.66/linear ft ductf			Online Retailers
LLAH for reduced duct leakage	\$200/ system	X		FSEC 2002
Compact Duct Design	-\$1.98/linear ft of R-6 duct reduced	X	X	Online Retailers
Raised Heel Truss	\$8/heel	X		Stakeholder Interview

Table Notes:

a Using R-4 rigid foam board

b Using R-4 above deck insulation with plywood facing

Per unit Incremental Construction Cost Range – DCS: Conditioned Plenum

Parameter	Assumption	Source	Notes
Modified Trusses	\$14/ modified trusses (or \$0.18/ s.f. roof area)	Stakeholder Interview	
Air Barrier (OSB)	\$0.31/s.f. plenum space	Online Retailer	Includes labor
Insulation + labor	\$1.29 - \$1.73/s.f. additional insulation area needed beyond ceiling		Using blown-in cellulose; only applies to additional area resulting from plenum design compared to ceiling area.
Sealed furnace	\$110 - \$400	Online Retailer	Incremental cost depends on condensing capabilities and capacity of equipment.
Interior Mechanical Closet	\$3.80/s.f. closet walls	Online Retailer	Attic consists of 4 newly constructed walls; garage consists of 2 newly constructed walls adjacent to conditioned space. Includes insulation and labor

Per unit Incremental Construction Cost Range – DCS: Open Web Floor Truss

Parameter	Assumption	Source	Notes
Open web floor trusses	\$0 - \$2.26/s.f. floor trusses	RS Means	Includes material and labor
Sealed furnace	\$110 - \$400	Online Retailer	Incremental cost depends on condensing capabilities and capacity of equipment.
Interior Mechanical Closet	\$3.80/s.f. closet walls	Online Retailer	Attic consists of 4 newly constructed walls; garage consists of 2 newly constructed walls adjacent to conditioned space. Includes insulation and labor

Per unit Incremental Construction Cost Range – DCS: Unvented Attic

Parameter	Assumption	Source	Notes
Insulation + labor	\$1.76/s.f. area of ceiling + \$3.49 additional roof area		First cost is incremental to what would have gone on ceiling area, second cost is for additional area resulting from placing insulation at roof.
Sealed furnace	\$110 - \$400	Online Retailer	Incremental cost depends on condensing capabilities and capacity of equipment.
Ignition barrier with SPF	\$0.10 - \$0.25/s.f. roof area	Manufacturer Quote	
Eliminate Attic Venting	\$3.14/linear ft soffit vent, \$10/linear ft ridge vent OR \$50/vent		\$50/vent was provided as estimate in multiple discussions with industry experts.



15.3 DCS Soft Costs

The Statewide CASE Team also considered "soft" costs when determining the cost implications of the strategies. "Soft" (or secondary) costs are generally hard to monetize and are project specific; these include items such as additional trips and adjusted schedules for trades, increased project oversight to ensure proper installation, and increased cycle time.

Soft cost considerations for the range of DCS strategies are listed in the table below.

DCS Strategy	Assumptions of "Soft" Costs	Estimated impacts to cost
All DCS strategies	The potential to reduce HVAC equipment size and supply duct runs	Would reduce material and labor costs. Could result in cost savings of \$100 - \$400+ (Meritage 2014)
Dropped Ceiling	Quality air-sealing of dropped ceiling space Trades aware not to create penetrations through space	Quality air sealing of the dropped space will increase labor costs. Increased project oversight and trade communication will be required to ensure trades are aware of restraints.
Conditioned Plenum	Quality air-sealing of plenum space	Quality air sealing of the dropped space will increase labor costs.
Open-Web Floor Truss	Quality air-sealing of rim joist	Having quality air-sealing of the rim joist may increase material and labor costs.
Mechanical Closet	Requires careful consideration of placement of closet	Designers must coordinate with HVAC contractors on location of closet to work with duct layout.
Unvented Attic	Requires quality air-sealing of the attic/roof	Having quality air-sealing at the roof instead of the ceiling may increase material and labor costs
	Additional trips for SPF insulation	Some SPF may be required to dry and cure at a certain depth before more is applied. This could be worked into the insulation contractor scheduling for production home builders.